



**To:** Indiana's Workforce System

**From:** Indiana Department of Workforce Development (DWD)

**Date:** September 30, 2022

**Subject:** DWD Policy 2022-06  
Non-formula Grant Performance Management

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## Purpose

This policy identifies DWD grant management strategies, establishes grantee performance expectations, related technical assistance strategies, and identifies potential consequences for grant underperformance. This guidance is intended to cover most non-formula grants issued by DWD's Workforce Division.

## References

- Workforce Innovation and Opportunity Act (WIOA) Section 116
- 2 CFR 200.208
- 2 CFR 200.303(a)
- 2 CFR 200.339
- 2 CFR 200.400(c)
- U.S. Department of Labor Employment and Training Administration (USDOL/ETA) Grantee Handbook *Effectively Managing Competitive Grants*, Issued June 2020<sup>1</sup>

## Content

A grant's period of performance is the authorized timeline for grant planning and implementation. All grant activities, performance outcomes, and grant expenditures must occur within this timeframe.<sup>2</sup> Managing the grant period of performance is critical to meeting performance outcomes.

Grant performance outcomes will vary depending on the type of grant that is awarded. The primary indicators of performance<sup>3</sup> may apply to funding opportunities such as the National Dislocated Worker Grants (NDWG) and applicable Rapid Response grants, while other grants may require performance measures to be defined and agreed upon by the grantor/grantee within the grant application/proposal and/or the Statement of Work (collectively, the Project Plan). Although specific measures may vary, many awards have enrollment and expenditure goals as foundational performance measures.

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<sup>1</sup> [https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/ETA\\_Grantee\\_Handbook.pdf](https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/ETA_Grantee_Handbook.pdf).

<sup>2</sup> USDOL Grantee Handbook.

<sup>3</sup> WIOA Section 116.

## ***DWD Grant Management Strategies<sup>4</sup>***

Based on the type of grant, DWD will implement any or all the following grant management strategies<sup>5</sup> to support grantees and facilitate successful outcomes.

- **Grant Review Meetings:** DWD may facilitate periodic one-on-one grantee meetings to review grant performance, address concerns, answer questions, and provide any needed technical assistance.
- **Proactive Communication:** Grantees are expected to report implementation and grant management challenges as they occur to the applicable grant manager, as well as the Regional Support Manager (RSM), if applicable. DWD shall promptly respond by providing appropriate technical assistance to preclude performance and fiscal issues.
- **On-Site Implementation Visit:** DWD may schedule an on-site (or virtual) visit within the first six months of the grant to ensure grantees are set up for success.
- **Progress Review:** Periodic review of grant performance.
- **Statewide Roundtables:** DWD may coordinate, and host state-wide roundtables to share new programmatic, operational, and fiscal information and to provide a forum for discussing grantee challenges and promising practices.
- **Grantee Reports:** Grantees may be required to prepare and submit grant activity reports. Report content will depend on the requirements and guidelines of the specific grant.
- **DWD Monitoring:** Non-formula grants will be included in routine DWD monitoring. All DWD grant management documentation will be made available for monitoring purposes.

## ***DWD Grant Management: Progress Review***

The primary goal of the DWD progress review is to support the success of the grantee. Progress reviews enable early identification of potential performance issues<sup>6</sup> and support grantees with timely resolution.

Reviews should occur at least quarterly and may include an analysis of any or all the following data sources: the Project Plan, grantee reports, invoices, DWD system reports, fiscal data, and participant electronic records.

Reviews will generally focus on the following accountability criteria:

1. Grant activities and milestones;
2. Expenditures;<sup>7</sup>
3. Established deliverables;
4. Applicable performance indicators;<sup>8</sup> and
5. Case management practices;
6. Additional criteria based on new guidance, unique funding opportunity requirements, and/or special projects.

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<sup>4</sup> 2 CFR 200.303(a), and 2 CFR 200.400(c).

<sup>5</sup> Scope and frequency are dependent upon unique grant requirements and grant management needs, with a general expectation of quarterly progress reviews.

<sup>6</sup> 2 CFR § 200.303(d).

<sup>7</sup> This may include expenditure reviews such as: being on target with expenditures at progress points throughout the grant, proper fiscal management practices, strategic use of funding streams, etc.

<sup>8</sup> Such as WIOA Section 116, if applicable.

It is the expectation that all Project Plans will identify quantitative deliverables based on the accountability metrics above for the first 90 days and at 25%, 50%, and 75% of the grant period of performance. Table I provides an example based on a grant with a two-year period of performance.

<b>EXAMPLE: Deliverable Timeline by Percentage of the Grant's Period of Performance (POP)</b>							
<b>Q1</b>	<b>End of Q2 (25% of POP)</b>	<b>Q3</b>	<b>End of Q4 (50% of POP)</b>	<b>Q5</b>	<b>End of Q6 (75% of POP)</b>	<b>Q7</b>	<b>End of Q8</b>
Short-term (90 days) Deliverables	Deliverables (D)	(D)	Deliverables (D)	(D)	Deliverables (D)	(D)	Final Performance Outcomes

DWD recognizes that outcomes and expenditures for a period of performance may be impacted by the date of availability of funds to the grantee. Under circumstances by which grantee contracts may be delayed, considerations will be made prior to any actions taken.

***NOTE: Grantees are encouraged to proceed with project implementation upon receipt of the notice of award letter to ensure timeline milestones are achieved while contracts are finalized.***

### ***DWD Grant Management Performance: Concern Levels***

For the purposes of this policy, “concern” is to be understood as to the extent to which a grant is in jeopardy of underperformance based on the comparison of actual progress against mutually agreed upon projected benchmarks, deliverables, and expenditures.

DWD grant managers conduct periodic progress reviews based upon the accountability criteria listed above. These reviews produce a snapshot of grant performance that facilitate early identification of performance issues. Concern levels are based on number of identified issues, the severity of the issue(s) and the time remaining in the period of performance.

Although concern definitions may differ depending upon the unique requirements of a grant or program, concerns are generally categorized as follows:

- No Concern
  - Grantee is meeting expectations for all the accountability criteria listed above.
- Low Concern
  - Grantee is not meeting expectations for one (1) of the accountability criteria listed above.
- Moderate Concern
  - Grantee is not meeting expectations for two (2) of the accountability criteria listed above.
- High Concern
  - Grantee is not meeting expectations for three (3) or more of the accountability criteria listed above.

***Note: While these levels of concern are generally applicable, a situation may arise where a single issue or occurrence warrants a higher level of concern.***

DWD grant managers will communicate concern category info, grant progress, any identified performance issues, and resulting concern levels to grantees throughout the period of performance.<sup>9</sup> Grant managers and grantees will work together to address any performance concerns or deficiencies to ensure successful outcomes.

### ***DWD Grant Management: Performance Intervention Strategies***

DWD may implement the following intervention strategies as needed:

- Individualized technical assistance;
- More frequent grant progress reviews and review meetings;
- If the issue is common across grantees, statewide roundtables may be implemented to identify contributing factors and collaboratively develop appropriate resolution strategies;
- Development of an improvement plan;
- Grant SOW modification to better support positive outcomes (if allowable); and/or
- Other interventions deemed appropriate by DWD.

### ***DWD Grant Management: Lack of Performance Progress***

When developing Project Plans, it is the expectation that quantitative deliverables are identified and associated with periodic progress points of the period of performance (e.g., for the first 90 days and at 25%, 50%, and 75%). Actual performance should be within 80% of target deliverables for respective progress points to ensure performance outcomes are achieved by the end of the grant. The table below provides examples of expected performance levels and potential actions if performance falls below the expectation. Specific expectations will be outlined by grant managers.

<b>EXAMPLE: Potential Performance Interventions Based on Elapsed POP<sup>10</sup></b>		
<b>Percent of POP</b>	<b>Expectation (Actual Performance)</b>	<b>Potential Actions</b>
90 days	Within 80% of target deliverables	<ul style="list-style-type: none"> <li>• Any or all interventions described above may be initiated or escalated.</li> </ul>
25%	Within 80% of target deliverables	<ul style="list-style-type: none"> <li>• Any or all interventions described above may be initiated or escalated.</li> </ul>
50%	Within 80% of target deliverables	<ul style="list-style-type: none"> <li>• Any or all interventions described above may be initiated or escalated.</li> <li>• Grant funds may be frozen until performance is within the acceptable percentage.</li> <li>• Funds may be withdrawn for redistribution.</li> </ul>
75%	Within 80% of target deliverables	<ul style="list-style-type: none"> <li>• Any or all interventions described above may be initiated or escalated.</li> <li>• Grant funds may be frozen until performance is within the acceptable percentage.</li> <li>• Funds may be withdrawn for redistribution.</li> </ul>
100%	100% of deliverables	<ul style="list-style-type: none"> <li>• Access to future non-formula grant opportunities may be restricted.</li> </ul>

<sup>9</sup> Scope and frequency are dependent upon unique grant requirements and grant management needs.

<sup>10</sup> Period of Performance.

The grantee will be notified in writing of any action that will be taken, the reason why the action is being taken, and what steps that will need to be taken to remove the action (if applicable).<sup>11</sup>

If a grantee disagrees with an action taken due to underperformance, they must contact their grant manager for next steps. Actions may be adjusted based on additional information or data provided by the grantee.

In addition to the grant management and performance implementation protocols described herein, grant performance outcomes will be reviewed and assessed during routine DWD grantee monitoring and may result in monitoring findings and corrective action requirements.

## **Action**

Grantees are to be aware of the contents of this policy and share this policy with all appropriate stakeholders. Grantees will be expected to fully participate in all DWD grant management strategies to ensure established performance deliverables are realized.

## **Effective Date**

Immediately.

## **Ending Date**

Upon rescission.

## **Additional Information**

Questions regarding the content of this publication should be submitted to [policy@dwd.in.gov](mailto:policy@dwd.in.gov).

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<sup>11</sup> 2 CFR 200.208(d).