

Appendix G6b

FISCAL MONITOR REVIEW Policy

Treatment Programs

On a bi-annual basis, 100% of the funded treatment programs will have a fiscal monitor performed by the Substance Abuse Prevention and Treatment (SAPTA) staff, or a qualified audit contractor on behalf of the Agency.

Coalitions

Generally, all coalitions will have a fiscal monitor on an annual basis. This includes, but is not limited to, conducting sample reviews on subrecipient documentation for 10% of subrecipients funded through the coalition. A review of three months of cancelled checks will be compared to information from the State's accounting system. This will demonstrate the timeliness of payments to subrecipients.

Other visits may be conducted as needed, as determined by SAPTA.

When possible, fiscal monitors may be done in conjunction with a program compliance monitor. This reduces the burden on the program and allows cohesiveness between the two reports. In addition, it allows for greater information-sharing for all involved.

I. SELECTION OF PROGRAMS TO BE MONITORED

The selection process for programs to be monitored in any given year will be based upon:

- a. Program Monitor recommendations.
- b. Programs having noted difficulties with fiscal process for reimbursement.
- c. Requests from programs for review and assistance.
- d. Review of outside/independent audit reports.
- e. Complaints with fiscal implications.
- f. The annual or bi-annual monitor is due.
- g. Random selection.

II. PROGRAM NOTIFICATION

The program is notified of the date scheduled for their fiscal monitor review. A confirmation letter is sent to the Executive Director and a copy is provided to the Board President. If there is a conflict, the program is asked to notify the Agency 5 working days prior to the visit to allow time to reschedule.

The program is requested to compile information necessary for their fiscal review. The information will consist of items being checked on the monitor form. For example, bank statements, cancelled checks, signature authorization verification, invoices, etc.

III. FISCAL MONITOR PREPARATION AND OFFICE REVIEW

Prior to the on-site review, SAPTA staff will conduct a desk monitor that consists of completing as much of the Fiscal Monitor Report as possible from the information contained at the Agency. This includes reviewing the last two audit reports and noting any questions or issues that need to be addressed. Also reviewed is the Policy and Procedure Manual, completing as many questions on the Fiscal Monitor Report form prior to the site-visit. Any issues or questions should be provided on the form prior to sending the draft to the program. Providing the program with a draft document allows them time to prepare responses and/or documentation needed during the monitor visit. This version of the monitor report is in draft form and is provided to the sub-grantee prior to the visit to allow time to compile the information necessary to complete the Fiscal Monitor Report. Any concerns to be addressed during the fiscal monitor visit are noted within the draft monitor report.

The sub-grant file information is compared with program files during the review and checked for consistency.

A review of Nevada Health Information Provider Performance System (NHIPPS) fiscal submittals and backup worksheets are done prior to the site-visit. Any questions or concerns are addressed during the fiscal monitor.

Prior program monitor reports are reviewed and any corrective action plans are noted and reviewed with the program during their fiscal monitor review.

IV. ON-SITE MONITOR

If information is not available during the site visit, reimbursements may be held until the documentation is provided to complete the fiscal monitor.

Entrance Interview

An entrance interview is conducted so SAPTA staff can go through the process that will be followed so the program will know what to expect and to allow all those participating to ask questions.

Fiscal Monitor

On-site fiscal monitor is conducted and any concerns are noted within the monitor form and discussed with the program. If applicable, any Compliance Action Plans (CAPs) are noted within the Fiscal Monitor Report and submitted to the program for review and approval. The information about what is expected within the CAPs should be clear and concise. A deadline is imposed on receiving the information contained within the CAP. A copy of the information is also sent to the program's Board President.

Exit Interview

An exit interview is conducted between SAPTA and the program. During this meeting, the outcomes of the site-visit are reviewed and any CAPs are discussed. This provides an

opportunity for any questions to be addressed and clarification to be provided. Additional items may be added to the CAP and further comments added to the monitor after the exit interview based on further review of the documentation. A final report is provided to the program within two weeks of receiving all information requested at the monitor or during follow up. The final report contains all CAP items and recommendations.

V. FOLLOW-UP AND COMPLIANCE ACTION PLAN

Follow-up is done to ensure all the information noted within the CAP is received. As a courtesy, contact may be made with the program 10 days prior to CAP deadline to check the status. This also provides an opportunity to provide any technical assistance that may be needed. Once the information is received it goes through an internal review and approval process and, if necessary, technical assistance is provided to help the program with any issues that may be delaying their ability with completing the information needed. Once the information is approved, a letter is sent acknowledging acceptance of the information and completion of the fiscal monitor. A copy of the letter is sent to the program's Board President.

If the program has not complied with any required action, the matter is brought to the Agency Director's attention for further instruction and recommendation.

Not completing the CAP may result in any of the following actions:

- Specific costs may be determined as unallowable and the program must reimburse the Agency, or as an option, the cost can be deducted from current or future reimbursement requests at SAPTA's discretion.
- Current reimbursement requests may be held until all items are addressed to the satisfaction of the Agency.
- Termination of current funding following award guidelines.
- Disqualification for future SAPTA funding.