# Chapter 12: Programmatic Oversight, Monitoring and Audit Requirements

## Chapter Overview

By the end of this chapter, you will be able to:

- Describe the importance of program oversite and monitoring.
- Adhere to the compliance review process.
- Explain the verification for Completion and Exit metrics.
- Attend administrator meetings to learn about network updates and provide feedback on programmatic progress.

# Program Oversite and Monitoring

**Program oversite** is the process designed to ensure that grantees are making the expected incremental progress to meet their goals as defined in their Work Plan. The JTED Grant Manager is responsible for the program oversite. The JTED Grant Manager's responsibilities include but are not limited to; supporting the implementation of grant programs, ensuring budgets are within the scope of funding, enforcing regulatory compliance, ensuring grantees progress towards meeting required outcomes, and enforcing progressive corrective action. Monthly reports on progress and technical assistance reinforce the oversite functions.

**Program monitoring** is a requirement for grantees funded through the JTED Program and are subject to fiscal and programmatic monitoring visits by the Office of Employment and Training (OET) monitoring unit in accordance with 2 CFR 200.337. Scheduling and frequency of monitoring is based on the grantees risk factors identified through the Internal Controls Questionnaire, Programmatic Risk Assessment, and grantee history. In most cases, a program and fiscal monitor will work collaboratively in completing the monitoring visit (either in person or virtually).

***Note****: The DCEO may modify the terms of a grant based on program performance.*

***Note****: Grantees are required to have an open-door policy allowing for periodic visits by the DCEO monitoring unit and* JTED *Grant Manager to evaluate the progress of the program and provide documentation upon request of the monitor or grant manager.*

# Compliance Review

Grantees will be assessed to determine the impact their program is having on their targeted populations and the effective and efficient utilization of the funds. The reviews will assess how well grantee staff are meeting proposed goals in the planned timeframes, how many customers are being served, how the money is being spent, whether any problems have developed that may hinder the progress of the project, and if they are delivering services in a way that is compliant with:

- DCEO standards, policies, and procedures
- State of Illinois regulatory guidelines
- State and federal laws
- JTED requirements and guidance outlined in the Grantee Manual, including core equity values

Grant Managers and Monitors will conduct periodic on-site/virtual monitoring and performance reviews (at least once a month) during the grant period. All programs are subject to compliance reviews throughout the fiscal year.

The reviews include, but are not limited to:

- Validating that the grantee's financial management system is structured to provide accurate, current, and complete disclosure of grant expenditures. Internal controls align with state, federal, and grant regulations.
- Confirming that all expenditures are in accordance with the provisions, terms, and conditions contained in the grant agreement with the Department.
- Verifying that customer/participant files are maintained and contain documentation sufficient to demonstrate eligibility for participation in the program, support services, and the credentials they seek to earn.
- Verification that the grantees performance and expenditures are meeting the projected timelines.

*Note: See **Section 11: Finances, Records, and Reports** for information on customer/participant files.*

# Compliance

JTED Grant Managers will conduct **compliance reviews** to ensure grantees are adhering to program expectations based on the grant agreement and the approved Work Plan. During this monitoring process, the grantees' Grant Manager will review customer data from the JTED Reporting System to determine each grantee's progress toward their goals.

Based on the data entered into the Reporting System, a Dashboard will be generated for grantees. The dashboard provides real-time data showing where customers are in the intake/eligibility process all the way up through program completion. Partners can use the data in the dashboard to access filtered lists of customers for easy access to customer program information.

JTED Grant Managers will assess if grantees are in the White, Yellow, Red Green, or Grey:

| Section | Count | % |
|---|---|---|
| **1. Topic** | | |
| White Color Code = FYI only. No action is needed. | 1 | 10% |
| Yellow Color Code = Action is needed. . | 2 | 20% |
| Red Color Code = Red flag - Immediate action is needed. | 2 | 20% |
| Green Color Code = This step is complete or meets a program requirement. | 4 | 40% |
| Grey Color Code = This person is either not able to participate or quit participating in the program. | 1 | 10% |
| **Total** | **10** | |

*Note: the icon provides a definition for the item in the section.*

### Completion Documentation

Upload required credentials/certifications offered by the grantee. Examples would include, but may not be limited to; NCCER/TradesFutures Certificate, OSHA-10, First Aid/CPR, Flagger, Forklift, CDL, and etc.

***Note****: See Chapter 10: Data Management and Chapter 11: Finances, Records, and Reporting for more information.*

## Administrator Meetings

The Administrator meetings are designed for DCEO to present on grantee network progress, upcoming changes to programming, reporting, or important deadlines. This is also a time when the program administrators are encouraged to ask questions, make comments, and offer ideas on how to enhance the program.

More details regarding these meetings are available in the JTED Partner Guide.

## Audit Requirements

The State of Illinois requires all grantees to comply with federal audit requirements in addition to State-specific audit requirements. This section will be an overview of the different types of audits and when they are required.

***Note****: For complete information regarding audit requirements and compliance please visit the GATA Resource Library. For the most current and up-to-date information, changes in thresholds, or other relevant regulatory information, attached is a link to the administrative code ilga.gov/commission/JCAR/admincode/044/044070000A00900R.html If you have questions regarding audit requirements, please email your questions to ceo.externalauditunit@illinois.gov.*

### Audit Types

All Grantees are required to submit a GATA audit in GATA portal. Financial Statement/Single Audits may be required based on the amount of eligible grant expenditures during grantee's audit period.

A grantee, excluding for-profits, who expends $1,000,000 or more during the grantee's fiscal year in federal awards (federal pass-through and direct federal funds) from all sources must have a **single audit** conducted in accordance with 2 CFR 200.514. Grantees meeting certain requirements may elect to have a program-specific audit conducted in accordance with 2 CFR 200.507.

For-profit awardees who expend $1,000,000 or more in federal pass-through funds from a State awarding agency during the awardee's fiscal year must have a program-specific audit conducted in accordance with UR section 200.507

A grantee who expends less than $1,000,000 during the grantee's fiscal year in federal awards (federal pass-through and/or direct federal funds) from all sources is not subject to the **federal audit** requirements for that fiscal year.

Grantees who expend less than $$1,000,000 in direct federal and federal pass-through funds from all sources are subject to the following audit requirements:

1. Grantees, including for-profits, who expend $750,000 or greater in State-issued awards are required to have an audit conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS).
2. Grantees, including for-profits, who expend $500,000 or greater in State-issued awards but less than $750,000 are required to have an audit conducted in accordance with Generally Accepted Auditing Standards (GAAS).
3. If the grantee, including for-profits, does not meet the threshold requirements above but has a financial statement audit conducted voluntarily or based on other regulatory requirements, it must submit those audits for review.
4. If a grantee, including for-profits, does not meet the threshold for requiring an audit to be conducted and does not have any audit conducted for other purposes, they must still annually complete the **audit certification** and **Consolidated Year-End Financial Report** in the GATA Grantee Portal.

***Note**: The uniform guidance is 2 CFR 200.501 -- Audit Requirements.*

***Note**: 30 ILCS 708/1 (Grant Accountability and Transparency Act)*

## Audit Reporting and Documentation

The audit certification (Step 1 in GATA Portal) will help grantees identify the type of audit that is required of their organization based on their response to a series of questions. Once completed, the system will provide grantees with their audit determination. A list of requirements will be produced in Step 3 in GATA Portal. Please give these instructions to your auditor. The audit certification must be submitted within 60 days of the end of the grantee's fiscal year.

### Single Audit Reporting Package

The following documents must be submitted by the grantee to the GATA Portal, in step 4:

- All items identified in UR section 200.512(c);

- Management letters issued by the auditors, and their respective corrective action plans if significant deficiencies or material weaknesses are identified; and
- Consolidated Year-end Financial Report with an "in relation to opinion".
- A copy of the results of the most recent peer review of the audit firm – Audit Firm Peer Review Letter and AICPA's letter of acceptance for the peer review letter

### Financial Statement Audit Reporting Package:

The following documents must be submitted by the grantee to the GATA Portal, in step 4:

- Financial Statements
- Summary Schedule of Prior Audit Findings
- Auditor's Report
- Including GAGAS requirement: Report on Internal Control over Financial Reporting and Compliance (200.515) for grantees with a year-end of 12/31/18 or later
- Corrective Action Plan
- Management letters issued by the auditors, and their respective corrective action plans if significant deficiencies or material weaknesses are identified;
- Consolidated Year End Financial Report with an 'in Relation to Opinion'
- A copy of the results of the most recent peer review of the audit firm – Audit Firm Peer Review Letter and AICPA's letter of acceptance for the peer review letter

## Audit Not Required and No Audit Conducted

For grantees that are not required to submit an audit report per the requirements above, grantees must still submit Steps 1, 2, and 5 in GATA Portal.

## Audit Submission Timeline

Single Audit Packages must be submitted by the grantee to the Federal Audit Clearinghouse FAC. The due date of submission is the earlier of 30 calendar days after receipt of the auditor's reports or 9 months after the end of the grantee's audit period.
It is important to note that the State compliance items must be uploaded to the GATA Grantee Portal within 30 days of the FAC submission or 9 months after the grantee's fiscal year-end, whichever date arrives sooner. All other audit packages or required documentation must be uploaded to the GATA Grantee Portal within 60 days after the grantee's fiscal year.

Specific directions on how to navigate the Grantee Portal can be found in the Resource Library GATA. Grantees may contact ceo.externalauditunit@illinois.gov with questions or clarifications regarding audit requirements.

***Note**: Non-compliance with audit requirements could result in implementation of the Grantee Compliance Enforcement System (GCES) and may result in the inability to receive grant funds.*

# Resources

- 2 CFR 200
- 44 IL Admin. Code 7000.90
- Resource Library – GATA
- Illinois Grant Accountability and Transparency Act (GATA) Grantee Portal
- DCEO FAQ 2026 - audit-faq-2026.pdf
- DCEO Training, including in-person weekly training, - Upcoming Grant Trainings
- DCEO Video Training & Resources