

SEQUENCING AN OVERSIGHT PROGRAM

Phase 1: Build Awareness

Understand the grants oversight landscape--the risks, red flags, schemes, and consequences of noncompliance.



Phase 2: Set the Standards

Create or identify legal and procedural authorities that govern the organization and the program. Set the tone for integrity at the top.



Phase 3: Address Compliance Breaches

Implement internal controls, create or identify investigative tools and resources, and detect breaches through audits or reporting hotlines.



Phase 4: Test the Standards

Test the oversight process through Monitoring and Data Analytics to see how it performs.



Phase 5: Remediate, Recognize, Reward

Provide Technical Assistance, training, mentoring, resources, and repercussions to Non-Compliant Entities. Recognize and reward top performers.



Phase 6: Retool

Apply lessons learned. Retool processes, policies, contracts, training, resources, rewards, and consequences. Communicate these improvements to stakeholders.

