

# EVALUATION REPORT

## CONSOLIDATED FINDINGS OF OFFICE OF INSPECTOR GENERAL REPORTS ON SBA'S GRANT PROGRAMS, FISCAL YEARS 2014–2018





# EXECUTIVE SUMMARY

## CONSOLIDATED FINDINGS OF OFFICE OF INSPECTOR GENERAL REPORTS ON SBA'S GRANT PROGRAMS, FISCAL YEARS 2014–2018

Report No.  
19-02

November 8,  
2018

### What OIG Reviewed

Over the last 5 years, the Office of Inspector General (OIG) issued nine audit and evaluation reports reviewing the Small Business Administration's (SBA's) management of its grant programs and grant recipient compliance with grant requirements. In those reports, we identified significant issues regarding the management of millions of dollars of federal funds allocated for small business expansion and growth, disaster assistance funding, and recovery efforts.

These nine reviews covered \$63.4 million of grants awarded to support entrepreneurial development programs that provide training, mentoring, and counseling to small business owners and entrepreneurs, as well as recovery assistance to small businesses in disaster areas. The programs reviewed included Small Business Development Centers, the SCORE Association, the State Trade and Expansion Program, and the Boots to Business program.

This report summarizes the issues found in seven audit and two evaluation reports issued by OIG. We have reported the results of those reviews and provided recommendations to assist SBA in correcting the specific issues identified.

Our review objectives were to (1) provide SBA management with a summary of systemic issue areas identified in OIG audit and evaluation reports and (2) identify agencywide improvements for grants management.

### What OIG Found

We identified systemic issues with SBA's financial and performance oversight across its multiple grant programs. Specifically, SBA's process to monitor how grant recipients spent federal funds and to assess performance of its grant programs was ineffective. While SBA was generally responsive to the recommendations in our reports, its decentralized grants management function inhibits agencywide improvements to its grants management process. As a result, SBA's grant programs are at risk of funds not being used

for their intended purpose and of not achieving program goals and objectives.

### OIG Recommendations

We made four recommendations to enhance SBA's management and oversight of its grant programs. First, we recommended that SBA assess its decentralized grants management structure to ensure that it performs comprehensive oversight. Additionally, we recommended that SBA establish effective controls to enforce financial and performance reporting requirements. Further, we recommended SBA develop outcome-based measurements to assess the impact of its programs. Lastly, we recommended that SBA train its grants officers and program personnel on its established grants management oversight procedures.

### Agency Comments

SBA management concurred with all four of the recommendations, and its planned actions resolve the four recommendations. SBA plans to conduct an evaluation of the grant management organizational structure to ensure consistent compliance and comprehensive oversight of all SBA grant programs. Additionally, SBA plans to implement controls to ensure all grants officers and program personnel enforce requirements regarding accurate and complete submission of financial and performance reports and for reviewing grant applicants' proposed performance measures. Further, SBA plans to implement a training program for all grants officers and program personnel to enforce compliance with SBA-established policies and procedures for grants management. Lastly, SBA plans to implement a new grants management system to support its oversight of the grant programs.




**U.S. SMALL BUSINESS ADMINISTRATION  
OFFICE OF INSPECTOR GENERAL  
WASHINGTON, D.C. 20416**

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**Final Report Transmittal**  
Report Number: 19-02

**DATE:** November 8, 2018

**TO:** Linda E. McMahon  
Administrator

**FROM:** Hannibal "Mike" Ware   
Inspector General

**SUBJECT:** Consolidated Findings of the Office of Inspector General Reports on SBA's Grant Programs, Fiscal Years 2014–2018

This report presents the result of our evaluation of the Small Business Administration's (SBA's) consolidated findings of the Office of Inspector General reports on SBA's grant programs, fiscal years 2014–2018. We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation.

We considered management comments on a draft of this report when preparing the final report. SBA agreed with all four recommendations.

We appreciate the courtesies and cooperation extended to us during this evaluation. If you have any questions, please contact me at (202) 205-6586 or Andrea Deadwyler, Assistant Inspector General for Audits, at (202) 205-6616.

cc: Pradeep Belur, Chief of Staff  
Allen M. Gutierrez, Associate Administrator, Office of Entrepreneurial Development  
Peter Cazamias, Associate Administrator, Office of International Trade  
Larry Stubblefield, Associate Administrator, Office of Veterans Business Development  
Seán Crean, Executive Director for Office of Executive Management, Installation, and Support Services  
Christopher Pilkerton, General Counsel  
Martin Conrey, Attorney Advisor, Legislation and Appropriations  
LaNae Twite, Director, Office of Internal Controls

## **Table of Contents**

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Introduction.....	1
Objectives.....	3
Results.....	3
Conclusion .....	4
Recommendations.....	5
Appendix I: Objectives, Scope, and Methodology.....	7
Use of Computer-Processed Data.....	8
Appendix II: Summary of Systemic Issues in SBA's Programs.....	9
Appendix III: Agency Comments.....	10

## Introduction

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The Small Business Administration (SBA) has set a strategic goal to build healthy entrepreneurial ecosystems and create business-friendly environments. To achieve this goal, SBA provides management and technical assistance training programs that assist small businesses with starting, growing, and competing in global markets. SBA relies mostly on its resource partners, including public or private institutions of higher education and state and local governments, to deliver its entrepreneurial development programs through grants and cooperative agreements. The fiscal year (FY) 2018 Consolidated Appropriations Act allocated \$247.1 million for small business and entrepreneurial development programs.<sup>1</sup>

### *Entrepreneurial Development Grant Programs and Services*

Within SBA, the Office of Entrepreneurial Development (OED) oversees the majority of programs and services that support small businesses' training and counseling needs. OED's programs provide aspiring and current small business owners with a variety of free business mentoring and low-cost training services. OED's primary resource partners include the following:

- Small Business Development Centers—An extensive business education network comprised of 63 lead centers managing more than 900 subcenters, hosted by universities and state economic development agencies. The FY 2018 Consolidated Appropriations Act allocated \$130 million for SBA grants to Small Business Development Centers.<sup>1</sup>
- Women's Business Centers—A national network of more than 100 educational centers, which are designed to assist women in starting and growing small businesses. In FY 2018, Congress recommended that SBA use \$18 million to award grants to Women's Business Centers.<sup>2</sup>
- The SCORE Association—The nation's largest network of volunteer expert business mentors has more than 10,000 volunteers in 300 chapters. In FY 2018, Congress recommended that SBA use \$11.5 million to award grants to the SCORE Association.<sup>2</sup>

The Office of International Trade oversees programs and services to enhance the ability of small businesses to compete in the global marketplace. As part of the office's portfolio of programs and services, it partners with states and territory governments by awarding competitive grants to administer the State Trade and Expansion Program. This program assists small businesses with export development. In FY 2018, Congress allocated \$18 million to award grants for the State Trade and Expansion Program.<sup>1</sup>

The Office of Veterans Business Development oversees programs and services for veterans, service-disabled veterans, reserve component members, and their dependents or survivors interested in starting or growing a small business. The office primarily partners with Veteran Business Outreach Centers to conduct entrepreneurial development workshops and counseling services. The nationwide network includes more than 20 centers. The office also works with SBA's resource partners listed above, as well as other public or private institutions of higher education, to deliver

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<sup>1</sup> Public Law 115-141, Consolidated Appropriations Act, 2018 (March 2018).

<sup>2</sup> The explanatory statement accompanying the Consolidated Appropriations Act, 2018, H.R. Congressional Record 115 Vol. 164, No. 50 at H2522 (March 2018).

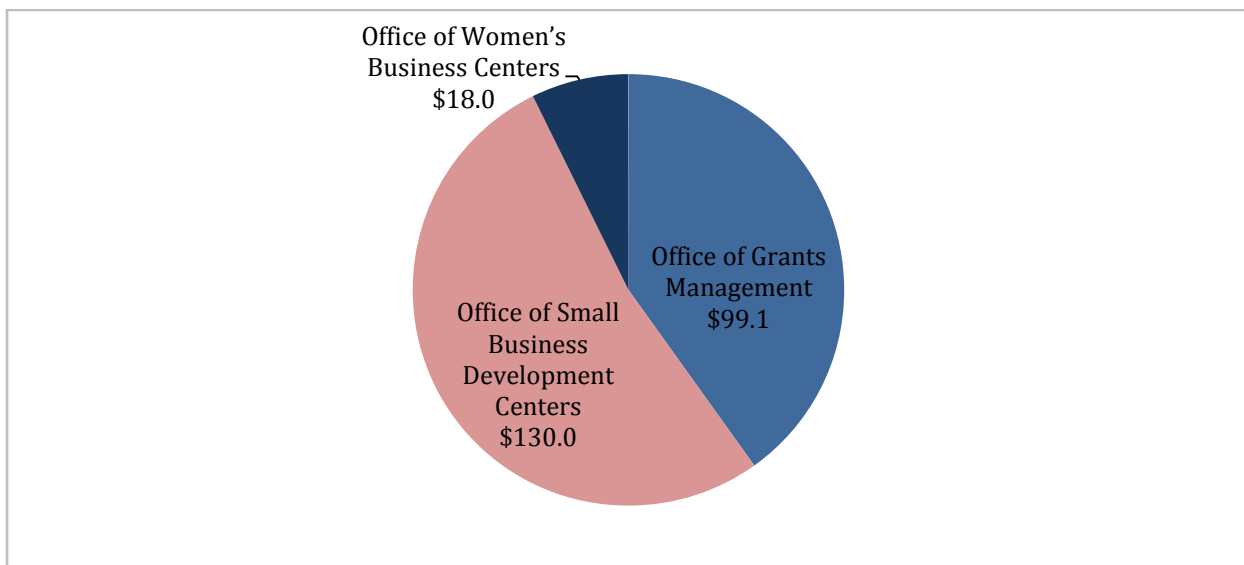
its veterans assistance programs. In FY 2018, Congress recommended SBA use \$12.3 million for its veterans outreach programs and services.<sup>2</sup>

In addition to the annual grants, SBA made awards to its resource partners to provide localized assistance to small businesses recovering from disasters. The most recent example of this type of additional assistance occurred after Hurricane Sandy, wherein Congress made \$19 million available for OED to award to its resource partners for disaster recovery efforts.<sup>3</sup>

### *Grants Administration Offices*

SBA has three separate program offices responsible for awarding, monitoring, and closing out grants to support SBA’s entrepreneurial development grant programs—the Office of Grants Management, Office of Small Business Development Centers, and the Office of Women’s Business Ownership. The Office of Grants Management, in collaboration with respective program offices, administers most of SBA’s grant programs, except for the Small Business Development Centers and Women’s Business Centers programs, which have their own grants officers to award, monitor, and close the grants. Figure 1 shows the amount of federal assistance each of the three offices administered based on FY 2018 appropriation allocations.

**Figure 1: SBA’s Entrepreneurial Development Program Funds Allocation for FY 2018 Administered by the Three Grants Offices (in millions)**



Source: OIG generated based on the FY 2018 appropriation allocations for entrepreneurial development programs.

### *OIG’s Review of SBA’s Grant Programs*

The Office of Inspector General (OIG) regularly conducts audits and evaluations of SBA’s grant programs. Between FYs 2014 and 2018, OIG performed nine reviews that covered \$63.4 million of grants awarded to support Small Business Development Centers, the SCORE Association, the State Trade and Expansion Program, and the Boots to Business program.

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<sup>3</sup> Public Law 113-2, Disaster Relief Appropriations Act of 2013 (January 2013). DRAA initially included \$20 million for this purpose; however, \$1 million was cancelled due to sequestration, the cancellation of budgetary resources provided by discretionary appropriations or direct spending laws.

Our work assessed SBA's management of the four programs listed above and its oversight of grant recipient compliance with grant requirements. We identified systemic issues regarding SBA's management of millions of dollars of federal funds allocated for small business expansion and growth, disaster assistance, and recovery efforts. We reported the results of our reviews and provided recommendations to assist SBA in correcting issues. This report summarizes the most significant findings that were prevalent throughout the Agency.

## **Objectives**

Our review objectives were to (1) provide SBA management with a summary of systemic issue areas identified in OIG audit and evaluation reports and (2) identify agencywide improvements for grants management. (See Appendix I for information on our scope and methodology.)

## **Results**

Our review of the four SBA grant programs identified systemic weaknesses in SBA's grants management. Specifically, SBA's process to monitor how grant recipients spent federal funds and to assess performance of its grant programs was ineffective. While SBA was generally responsive to the recommendations in our reports, its decentralized grants management function inhibits agencywide improvements to its grants management process. As a result, SBA's grant programs are at risk of funds not being used for their intended purpose and of not achieving their program goals and objectives. (See Appendix II, Table 2 for summary of these issues.)

### *SBA's Oversight of Grant Recipients' Use of Federal Funds*

We identified systemic issues with SBA's oversight of grant recipients' use of federal funds. These included instances of SBA not enforcing financial reporting requirements, not detecting grant recipient budget reallocations, using weak financial review procedures, and missing supporting documentation.

We found that SBA did not consistently enforce financial reporting requirements in all four programs we reviewed. SBA's decisions to not enforce certain financial requirements ranged from not requiring grant recipients to separate costs by activities to not requiring recipients to submit all financial reports. As a result, SBA could not detect and resolve grant recipient misuse of federal funds. SBA relies on these reports to track how grant recipients spend federal funds, and whether they are providing services in a timely manner. Without consistently enforcing this requirement, SBA has limited its ability to assess and manage the risks associated with grant recipient accounting and use of grant funds.

Moreover, SBA did not consistently detect grant recipient cost reimbursement requests that exceeded budgeted cost categories. Generally, SBA requires grant recipients to seek approval to under- or overspend their approved budget categories by 10 percent. By not consistently detecting instances of under- or overspending, SBA's programs are at risk of funds not being used for their intended purpose.

Finally, we consistently found weaknesses in SBA's reviews of grant recipient financial reports. The weaknesses that we found included: reviewers not detecting grant recipient errors, inaccuracies, or incomplete financial data; omitting required approvals; and using ineffective cost analysis techniques. Additionally, in two of the four programs, SBA did not ensure that reimbursed expenses had proper supporting documentation. Without more robust review procedures, SBA's programs are at risk of improper or inappropriate, unallowed, or even fraudulent activity going undetected.

## *SBA's Oversight of Program Performance*

SBA did not establish an effective performance oversight process to ensure that it relied on quality data to assess the success of its grant programs. Specifically, SBA did not ensure that grant recipients provided accurate and complete performance data. We also found repeated instances where the performance data that grant recipients provided to SBA was not supported by adequate documentation. Additionally, similar to the financial oversight issues, we found that SBA did not consistently enforce performance reporting requirements for three of the four programs we reviewed. Contributing to these issues were further weaknesses found in SBA's review of grant recipients' performance reports. Specifically, we found recurring instances where SBA did not perform any data verification procedures and instances where SBA did not provide sufficient guidance and monitoring of grant recipient performance. By not conducting adequate reviews of the performance reports, SBA was not able to effectively provide guidance or monitor grant recipients to ensure that they met their milestones or accomplished their goals. Without accurate and complete performance reporting and substantial reviews of performance reports, SBA limits its ability to make informed decisions on the programs it's responsible for overseeing and cannot assess whether its programs are achieving the intended results.

Additionally, for two of the four programs reviewed, we found that SBA did not establish outcome-based performance measures. Instead, SBA relied on output-based measurements, such as numbers of participants, chapters engaged, or graduation rates, to evaluate the recipients' performance on achieving goals. While these output measurements can be helpful indicators of program activity, they do not indicate what the program accomplished in terms of actual applied assistance. Moreover, without outcome-based performance measures, SBA cannot ensure that its programs are fulfilling Congress' intent for the program.

## **Conclusion**

The grants management issues we identified were pervasive throughout the grant programs we reviewed. These systemic issues were indicative of the inefficiencies caused by SBA's decentralized grants management function. All three offices within SBA that awarded, monitored, and closed out grants used separate policies and procedures to manage Agency grants. Currently, there is no overarching office or official responsible for ensuring that the various grant-making components adhere to federal laws and regulations, that grants officers are adequately trained, or that policies and procedures used to award and monitor grants are efficient and effective. Further, when SBA implements corrective actions as a result of OIG's reviews of the individual grant programs, only the components responsible for overseeing that particular program are improved. Without a centralized reporting structure for these grant management components, SBA has missed opportunities to implement agencywide improvements to minimize the impact of the common financial and performance oversight issues that OIG continues to find in its reviews of SBA's grant programs. In recognizing common issues throughout its grants programs, SBA management should collaborate to foster agencywide improvements to ensure that federal funds are used for their intended purposes and that its programs achieve intended results.



## Recommendations

We recommend that the Administrator require that the three grants administration offices collaborate to:

1. Conduct an evaluation of SBA's decentralized grants management organizational structure to determine whether it is effective to ensure consistent and comprehensive oversight of these critical programs to ensure maximum impact.
2. Implement controls to ensure that grants officers and program personnel enforce requirements that recipients submit all required financial and performance reports and verify that the reported information is accurate and complete.
3. Implement controls to ensure that grants officers and program personnel responsible for reviewing grant applications verify that the applicants' proposals include plans to measure performance that will help SBA determine program outcomes.
4. Develop and provide training to all grants officers and program personnel responsible for monitoring grant recipient performance to enforce compliance with SBA's established policies and procedures for grants management and best practices for administering grant awards and monitoring performance.

## Analysis of Agency Response

SBA management provided formal comments that are included in their entirety in Appendix III. SBA management concurred with all four recommendations. Subsequent to receiving management's written comments, we met with grants management officials to clarify their proposed corrective actions and implementation timelines. Based on our discussion, we determined that management's proposed corrective actions were responsive.

## Summary of Actions Necessary to Close the Recommendations

The following provides a status of the recommendations and the actions necessary to close them.

1. **Resolved.** SBA management concurred with our recommendation and plans to conduct an evaluation of SBA's organizational structure for grants management to ensure that all policies, practices, and execution of grant responsibilities are consistently implemented. Management plans to complete final action on this recommendation by September 30, 2019. This recommendation can be closed once management provides evidence that it conducted an evaluation and implemented controls to effectively oversee Agency grant administration.
2. **Resolved.** SBA management concurred with our recommendation and plans to implement controls to ensure grants officers and program personnel understand their responsibilities to enforce requirements that recipients submit all required financial and performance reports. Grants management officials told us they plan to issue new standard operating procedures for grants management and provide training to grants officers and program personnel on established policies and procedures. They plan to implement these controls by September 30, 2019. Further, management plans to implement a new grants management system, which will support the Agency's oversight of the grants programs. Grants management officials told us that the system will enable them to effectively oversee grant

recipients' compliance with reporting requirements. Management plans to implement the system and complete final action on this recommendation by September 30, 2020. This recommendation can be closed once management provides evidence that it issued the standard operating procedures, trained its staff on the procedures, and implemented the grants management system.

3. **Resolved.** SBA management concurred with our recommendation and plans to implement controls to ensure that grants officers and program personnel responsible for reviewing grants applications require that applicant proposals include plans to measure performance in support of SBA program outcomes. Grants management officials told us they plan to issue new standard operating procedures for grants management and provide training to grants officers and program personnel on the established policies and procedures. Management plans to implement these controls by September 30, 2019. Further, they told us that the new grants management system will enable them to effectively oversee the grants officers' and program personnel compliance with established application review procedures. Management plans to implement the system and complete final action on this recommendation by September 30, 2020. This recommendation can be closed once management provides evidence that it issued the standard operating procedures, trained its staff on the procedures, and implemented the grants management system.
4. **Resolved.** SBA management concurred with our recommendation and plans to develop and implement a training program for all grants officers and program personnel and identify standard training requirements to ensure compliance with established policies and procedures for grants management. Management plans to complete final action on this recommendation by September 30, 2019. This recommendation can be closed when SBA provides evidence that it implemented the training program for all grants officers and program personnel.

## Appendix I: Objectives, Scope, and Methodology

This report summarizes the results of our review of OIG reports on SBA’s oversight of its grant programs. Our objectives were to (1) provide SBA management with a summary of systemic issue areas identified in OIG audit and evaluation reports issued between FYs 2014 and 2018 on SBA’s entrepreneurial development programs and (2) identify agencywide improvements for grants management.

To accomplish our objectives, we reviewed nine reports that OIG issued between FYs 2014 and 2018 that appraised SBA’s management of grant program issues. These reports reviewed programs within the following four SBA offices: the Office of Grants Management (OGM); the Office of Entrepreneurial Development (OED); the Office of International Trade (OIT); and the Office of Veterans Business Development (OVBD). We identified the causes in each report and the responsible agency components. We assessed whether the causes were indications of systemic issues when they occurred in multiple reports and within multiple programs. We summarized the systemic issues and assessed the need for agencywide improvements to SBA’s grants management and oversight processes. Additionally, we reviewed pertinent regulations and SBA’s policies and procedures to identify the roles and responsibilities of SBA personnel during the grants management and oversight processes. Table 1 displays the reports reviewed and the applicable program offices used in this summary report.

**Table 1: Grant and Program Reports Issued FYs 2014–2018**

OIG Report #	Title	Date	Program Office	Amount (in \$) Reviewed
14-19	Improvements Needed in the SBA’s Oversight of the Financial Management of the District of Columbia Small Business Development Center	9/29/2014	OED	625,000
15-15	SBA Needs to Improve Its Management of Disaster Technical Assistance Grants	7/31/2015	OED	12,600,000
16-06	Small Business Development Center Hosted by Middle Tennessee State University	12/18/2015	OED	1,900,000
16-12	The SBA’s Boots to Business Grant Award	3/28/2016	OVBD and OGM	3,000,000
17-09	Audit of New York Small Business Development Center’s Phase 2 Disaster Technical Assistance Grant	3/31/2017	OED	6,200,000
17-10	The SCORE Association’s Disaster Technical Assistance Grant	3/31/2017	OED and OGM	13,200,000
17-17	Review of SBA’s State Trade and Export Promotion Grant Program	5/4/2017	OIT and OGM	15,200,000
18-11	Audit of SBA’s State Trade Expansion Program	1/29/2018	OIT and OGM	3,900,000
18-20	The SBA’s Boots to Business Program	7/19/2018	OVBD and OGM	6,800,000
<b>Total Amount of Awards Reviewed</b>				<b>63,425,000</b>

Source: OIG generated based on issued reports.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency’s quality standards for inspection and evaluation. These standards require that we adequately plan evaluations, present all factual data accurately, fairly, and objectively, and that we present findings, conclusions, and recommendations in a persuasive manner. We believe that the

evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objectives.

### **Use of Computer-Processed Data**

We reviewed previously issued OIG reports that analyzed computer-processed data. As a result of our review, we identified systemic issues regarding SBA's reliance on inaccurate, incomplete, or unsupported financial and performance data. Recommendation 2 addresses the data issues.

## Appendix II: Summary of Systemic Issues in SBA's Programs

The table below presents the results of our analysis of the systemic issues described in OIG reports on SBA's management and oversight of four programs between FYs 2014 and 2018. The four programs were the Small Business Development Centers (SBDCs), SCORE Association (SCORE), State Trade and Expansion Program (STEP), and Boots to Business (B2B). We categorized the systemic issues by financial and performance oversight issues. See Appendix I, Table 1 for more information about the reports listed below.

**Table 2: Systemic Issues in OIG Reports on SBA's Programs Issued FYs 2014–2018**

Systemic Issues Identified	Number of Reports	OIG Report Numbers	Programs
<b>Financial Oversight</b>			
Not enforcing financial reporting requirements	4	14-19, 17-10, 17-11, 18-20	SBDC, SCORE, STEP, B2B
Cost category reimbursements exceeded budget	3	14-19, 15-15, 17-10	SBDC, SCORE
Weak financial review procedures	6	14-19, 15-15, 16-06, 17-09, 17-10, 17-11	SBDC, SCORE, STEP
Incomplete supporting financial documentation	3	15-15, 16-06, 17-10	SBDC, SCORE
<b>Performance Oversight</b>			
Inaccurate and incomplete performance data	3	16-06, 17-10, 18-20	SBDC, SCORE, B2B
Incomplete supporting performance documentation	3	17-09, 17-10, 18-11	SBDC, SCORE, STEP
Not enforcing performance reporting requirements	3	17-09, 17-10, 18-20	SBDC, SCORE, B2B
Weak performance review procedures	4	15-15, 17-11, 18-11, 18-20	SBDC, STEP, B2B
Performance measures lacked outcome results	2	17-10, 18-20	SCORE, B2B

Source: OIG generated based on review of released reports.

**SBA**

**EXECUTIVE DIRECTOR  
OFFICE OF EXECUTIVE MANAGEMENT  
INSTALLATIONS AND SUPPORT SERVICES**


**RESPONSE TO EVALUATION REPORT**



25 October 2018

**MEMORANDUM**

To: Ricardo Buglisi, Office of Inspector General

From: Seán F. Crean, Executive Director, Office of Executive Management, Installations and Support Services 

Subj: Agency Comments to Draft Report “Consolidated Findings of Office of Inspector General Reports on SBA’s Grant Programs, Fiscal Years 2014-2018” (Project Number 18004)

Thank you for the opportunity to respond to the Draft Report entitled “Consolidated Findings of Office of Inspector General Reports on SBA’s Grant Programs, Fiscal Years 2014-2018” (Project Number 18004). The objectives of the report are to: (1) provide SBA management with a summary of systemic issue areas identified in the Office of Inspector General (OIG) audit and evaluation reports; and (2) identify Agency-wide improvements for grants management. The Office of Grants Management (OGM) concurs with each of the OIG’s recommendations.

**Recommendation 1:** Conduct an evaluation of SBA’s decentralized grants management organizational structure to determine if it is effective to ensure consistent and comprehensive oversight of these critical programs to ensure maximum impact.

Explanation of Proposed Action: Concur. OGM, in consultation with the Office of Entrepreneurial Development (OED), Office of International Trade (OIT), and the Office of Veterans Business Development (OVBD), will conduct an evaluation of SBA’s organizational structure for grant management, compliance and oversight to ensure that all policies, practices, and execution of grant responsibilities are consistent with prevailing statute, regulation, and policies in support of the Agency’s mission.

Projected Completion Date: September 30, 2019

**Recommendation 2:** Implement controls to ensure that grants officers and program personnel enforce requirements that recipients submit all required financial and performance reports and verify that the reported information is accurate and complete.

Explanation of Proposed Action: Concur. OGM, in consultation with OED, OIT, and OVBD, will implement controls to ensure that grants officers and program personnel understand their responsibilities to enforce requirements that recipients submit all required financial and performance reports in accordance with statute, regulation, and policies in support of the Agency’s mission. Controls will be supported by acquiring a new grants management system.

Projected Completion Date: September 30, 2020



**Recommendation 3:** Implement controls to ensure that grants officers and program personnel responsible for reviewing grant applications certify that the applicants' proposals include plans to measure performance that will help SBA determine program outcomes.

Explanation of Proposed Action: Concur. OGM, in consultation with OED, OIT, and OVBD, will implement controls to ensure that grants officers and program personnel responsible for reviewing grants applications require that applicant proposals include plans to measure performance in support of SBA program outcomes. Controls will be supported by acquiring a new grants management system.

Projected Completion Date: September 30, 2020

**Recommendation 4:** Develop and provide training to all grants officers and program personnel responsible for monitoring grant recipient performance to enforce compliance with SBA's established policies and procedures for grants management and best practices for administering grant awards and monitoring of performance.

Explanation of Proposed Action: Concur. OGM, in consultation with OED, OIT, and OVBD, will develop and implement a training program for all grants officers and program personnel and identify standard training requirements to support effective and efficient performance by recipients in accordance with SBA-established policies and procedures for grants management.

Projected Completion Date: September 30, 2019