Monitoring and Compliance as a Performance Tool

Monitoring and compliance functions as a tool to indicate and drive federal program performance. Much like an annual physical, monitoring and compliance regularly takes the pulse of what's going on to make informed decisions regarding how to improve program outcomes. Monitoring and compliance answers important questions that communicate whether a program is meeting its objectives and goals. Accurately and efficiently capturing those answers provides valuable insights on program performance by serving as indicators of the vital signs of program health. Monitoring and compliance **registers risk** early on, **identifies areas of improvement**, and **relates key data** that serve as a baseline from which to communicate program successes and challenges.

The iterative monitoring and compliance process serves as a methodology to gather consistent and reliable program data (See Figure 1). Expert continuous application of monitoring and compliance gathers information on the program process and program outcomes, both of which are necessary to understanding program performance over time. Through independent review, analysis, data-driven decision-making, executing program improvements, and evaluation, a program team can meaningfully align activities to meet their goals, while assessing performance along the way. Effective and innovative monitoring and compliance and encourages action, enhances any concurrent evaluation activities, and incorporates user-friendly technology to provide valuable insights, saving time, money, and efforts. Well-executed monitoring and compliance verifies quality implementation, stimulates program improvement, and safeguards funding.
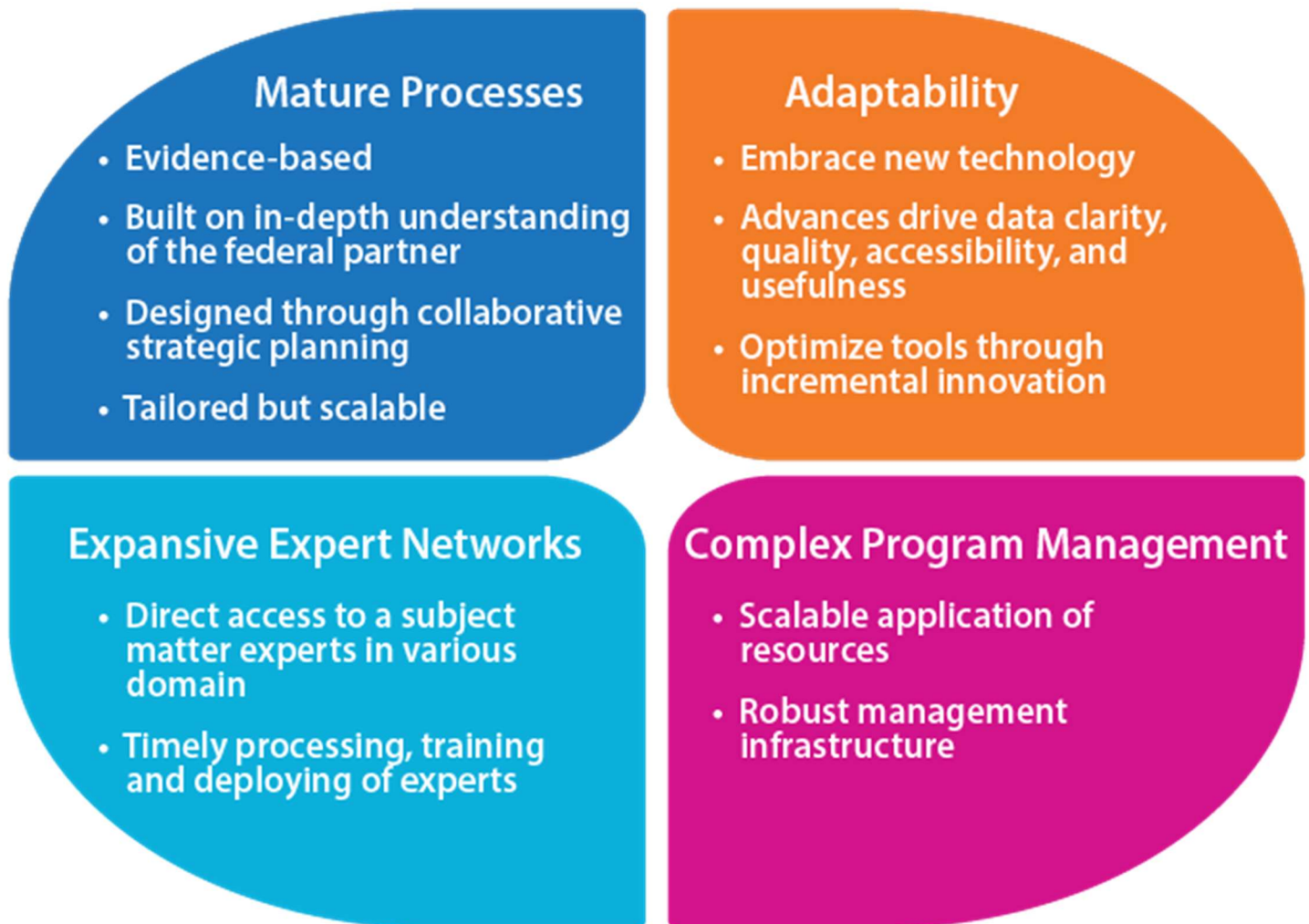
Figure 1. A Continuous Monitoring and Compliance Process Identifies Risks Early and Allows for Data-Based Improvements

A Framework for High-Performing Monitoring and Compliance

A framework for monitoring and compliance can ensure key components are present for a high-performing process and useful outcomes. Such a framework includes four main components: 1) mature monitoring and compliance processes; 2) adaptability in using technology; 3) expertise in managing complex programs, and 4) access to a strong network of relevant domain subject matter experts (See Figure 2). High-performing monitoring and compliance efforts yield consistent and reliable program information that allow program leaders to focus on analysis and action. This framework provides a flexible structure to guide the monitoring and compliance process and functions effectively across federal programs to address various social, health, and environmental challenges.

Figure 2. A Framework for Monitoring and Compliance

Mature Processes
- Evidence-based
- Built on in-depth understanding of the federal partner
- Designed through collaborative strategic planning
- Tailored but scalable

Adaptability
- Embrace new technology
- Advances drive data clarity, quality, accessibility, and usefulness
- Optimize tools through incremental innovation

Expansive Expert Networks
- Direct access to a subject matter experts in various domain
- Timely processing, training and deploying of experts

Complex Program Management
- Scalable application of resources
- Robust management infrastructure

Why Monitoring and Compliance

The U.S. Government Accountability Office (GAO) often recommends *monitoring and compliance* as a recourse to address areas identified for improvement in its *Priority Open Recommendations* reports for federal agencies. Recent GAO recommendations have pointed to disaster recovery[1], opioid use disorder[2], and Veterans health care[3] as domains that could benefit from monitoring and compliance. GAO's calls for monitoring and compliance urge program oversight, the establishment of performance measures, and development of effective tracking systems to drive critical program efforts to meet their goals and objectives.

Many federal agencies have seen the benefits of monitoring and evaluation as a performance tool. The results include the ability to point to how and why the program holds high value to the government, program staff, and importantly, the beneficiaries of the federal program (See Case Study).

Case Study: Office of Head Start Sees Increase in Teachers with a Bachelor's Degree

Recent successes in the Office of Head Start (OHS) demonstrate the value of monitoring and compliance as a program performance tool. From 2009 to 2019, the program reported an increase in the percentage of Head Start teachers with a bachelor's degree from **47% to 73%,** respectively[1].

The Head Start Program worked through a monitoring and compliance framework to guide and understand their program performance and address challenges, including:
- Working closely with key internal and external Head Start stakeholders in an extensive strategic phase to align monitoring and compliance efforts with OHS organizational goals;
- Involving Early Childhood subject matter expert to ensure monitoring processes informed on the desired long-term impacts for the field; and
- Implementing technology for program reviewers, such as easy-to-use data entry systems and dashboards, that enhanced OHS's use and evaluation of metrics for meaningful program decision-making.

[1] DeParle, J. (2019, February 4). *Clean Classrooms and Rising Scores: With Tighter Oversight, Head Start Shows Gains*. https://www.nytimes.com/2019/02/04/us/politics/head-start-preschool.html

Situating Monitoring and Compliance Among Other Program Assessment Approaches

Monitoring and compliance is a critical management activity for local, state, and federal agencies. The activities related to monitoring and compliance observe internal and external controls that impact daily program operations, which correspond to established performance standards. When done effectively, monitoring and compliance should never feel burdensome, unclear, or disconnected from other program evaluation efforts.

The use of an independent agent in monitoring and compliance provides an objective way to detect the early warning signs of potential areas of risk and ensures business integrity and accountability. Another valuable component of monitoring includes tracking of financial information and ethics—important to ensure compliance with fiscal regulations and ethical standards. The program activity, fiscal, and ethics-related data collected and analyzed allows agencies to take the necessary actions needed for course correction, to make informed decisions, and to eliminate future liability.

Monitoring and compliance is sometimes discussed along with the concepts of *fraud, waste and abuse* or *independent verification & validation* (IV&V). Comparing and contrasting these concepts can shed light on the distinct purpose and use of each, allowing us to see the value of the compatibility between these concepts in their use for federal program management (See Figure 3).

Figure 3. Comparing Monitoring & Compliance, Fraud Waste & Abuse; and Independent Verification & Validation.

APPROACH	PURPOSE	USE CASE
Monitoring & Compliance	Assess how a program conforms with a set of performance standards or accountability with set regulations	The Office of Head Start uses monitoring and compliance to understand how its nationwide programs are performing with respect to the Head Start (HS) Performance Standards and the Head Start Act.
Fraud, Waste & Abuse	Track and recover damages from 1. Fraud: attaining something of value through willful misrepresentation 2. Waste: Squandering resources 3. Abuse: Behaving improperly or misusing one's position	The Centers for Medicare and Medicaid investigates recipients of Medicare to identify fraudulent obtaining of healthcare payments or creating unnecessary cost to the Medicare program.
Independent Verification & Validation	An approach primality used in the information technology (IT) space to determine if a project team is building a product correctly, and if they are building the right product for the need. An independent agent is required.	The Centers for Disease Control and Prevention uses IV&V to test and validate Health IT products and platforms.

Summary

To move the needles on the current landscape of social, health, and environmental challenges—substance abuse, natural disaster recovery, and healthcare quality improvement— we must apply reliable evidence-based processes and tools to fully understand and communicate about program activities and outcomes. Monitoring and compliance is such a process and tool that communicates programs performance, provides the basis for improvements, and is paramount to the longevity of a program. DLH recognizes the complexity and value in implementing effective monitoring and compliance for government programs and wants to collaborate with federal agencies to make gains on these critical healthcare and social challenges.

We recognize the opportunities in adapting monitoring and compliance to incorporate technological advancements and connectivity to optimize program activities and increase transparency and accountability. Most of all, we share the national vision of delivering on the value of these programs for those whom it matters most, the children and families, individuals, service members and veterans we can serve as they work to improve their quality of life.

References:

[2] U.S. Government Accountability Office. (2019, March 25). Disaster Recovery: Better Monitoring of Block Grant Funds Is Needed, GAO-19-232. Retrieved from: https://www.gao.gov/products/GAO-19-232.

[3] U.S. Government Accountability Office. (2017, October 31). Opioid Use Disorders: HHS Needs Measures to Assess the Effectiveness of Efforts to Expand Access to Medication-Assisted Treatment, GAO-18-44: Retrieved from: https://www.gao.gov/products/GAO-18-44

[4] U.S. Government Accountability Office. (2019, April 10).Veterans Health Care: VA Needs to Address Challenges as It Implements the Veterans Community Care Program GAO-19-507T. Retrieved from: https://www.gao.gov/products/GAO-19-507T