



**Crater Regional Workforce Development Board
LWDA-15**

**Policy Number 2016-011
Effective Date: October 5, 2016
Revised: February 9, 2017**

Title: Monitoring Policy:

Background:

WIOA oversight and monitoring is essential to ensure the integrity of the WIOA system and WIOA funds, to review performance, assess compliance with applicable laws and regulations and identify successful methods and practices that serve to enhance the system as a whole through continuous improvement.

LWDAs are accountable for the expenditure of funds and the scope of activities associated with the implementation of WIOA. Monitoring and oversight at the local level identifies areas of strength and weakness in program operation and is critical in minimizing risk and reducing LWDA liability.

The Crater Regional Workforce Investment Group/Learn to Earn (CRWIG), Inc. will formally monitor all program services providers at least once a program year or as required by any funding source or grantor. The purpose of the monitoring review is to conduct oversight activities in order to ensure compliance with the terms, conditions, stipulations, deliverables and performance metrics specified under each contract, as well as, compliance with applicable Local, State and Federal policies and rules. A list of basic monitoring review elements is shown on Attachment I.

POLICY:

Service providers shall maintain the integrity of the data entered in the state's automated client data system by following each of the requirements for the use of the electronic data management system to generate current and accurate customer information.

The CRWDB Administrative Entity program administrators will ensure that WIOA program complies with federal regulations by:

- Developing a Workforce Innovation and Opportunity Act, Title I Monitoring Tool
- Providing on-site monitoring of One-Stop Centers, Eligible Training Providers and Youth Services on an annual basis
- Ensuring that identified Findings are reported to the contractors so that appropriate corrective action may be taken to secure compliance
- Depending on the severity of the Findings, providing a 60-day resolution to address Findings and receive corrective measures from providers. An extension request for corrective action may be granted and is limited to one month in duration.
- Should the CRWDB agree with the resolution, staff will notify the provider in writing
- If the CRWDB Administrative Entity disagrees with the handling of the situation the matter is handled under the process identified in the WIOA Final Rule.

Findings that result in disallowed cost will require the initiation of an audit resolution to begin debt collection and appeal procedures consistent with the Single Audit Act of 1996 and OMB Circular A-133 and the Grant Officer provisions of Sub-section 667.510.

SCHEDULE:

A schedule of contract monitoring reviews will be developed and communicated to the contractors/service providers by the Program Services Representative and Accountant/Fiscal Specialist.

PROCESS:

- A. The Program Services Specialist and the Accountant/Fiscal Specialist have the primary responsibility for the conduct of the monitoring review process. They will serve as the primary monitoring review team.
- B. A desk review will be conducted to review contracts, prior program monitoring review results, contract related correspondence, related fiscal issues, program statistical performance and any other applicable issues related to the contract operations.
- C. An entrance conference will be held with each contractor at the beginning of the monitoring review. The purpose of this conference is to inform the contractor of the scope of the monitoring review, make appropriate scheduling arrangements, to discuss applicable contract operations and to request specific information and records needed for the review. The entrance conference may be conducted either in person or via the telephone.
- D. An on-site review will be conducted at the contractor's primary physical site and may also be expanded to other related service delivery site locations if necessary. On-site review activities may include a review of participant records; tests of financial transactions and reviews of **Attachment I** related documentation and financial records; review of program service delivery

practices and operational strategies; interviews with staff; interviews with participants; observations of facilities, and verification of contract services.

- E. The results of the monitoring review are recorded, documented, and maintained in the contract monitoring review file. Additional worksheets, interview questionnaires, and specific written correspondence may also be developed and used based on need. It is the practice of CRWIG to discuss any issues or concerns identified during the monitoring review with the contractor while the process is ongoing.
- F. An exit conference may be held with the contractor at the end of the monitoring review. This conference may either be in person or via the telephone. The exit conference will be facilitated by the Monitoring Review Team.

MONITORING REPORT:

The draft monitoring review report will be prepared by the Program Services Representative and/or the Accountant/Fiscal Specialist upon the conclusion of the monitoring review. The report will be submitted for review and approval to the Executive Director; the final report is then sent to the contractor.

It is expected that the report will be submitted to contractors within thirty (30) days after the date of the exit conference or at the end of the review. A copy of the final monitoring review report will be maintained in the monitoring file.

MONITORING FINDINGS OR CONCERNS:

In cases where a monitoring report contains Findings and/or Concerns, a Corrective Action Plan (CAP) may be requested and/or other action directed and will be included with the delivery of the final report to the contractor.

In the event that a corrective action plan is requested, the specific area to be addressed will be identified and a timeframe for the submission of the plan will be specified. The Program Services Specialist and/or the Accountant/Fiscal Specialist will approve the plan and, if necessary, work with the contractor for implementation. A determination of compliance with the plan will be completed either before or in conjunction with the next monitoring review.

Findings indicate that the area is out of compliance with current federal, state, and/or local laws/regulations or policies. Each Finding has a required action to ensure compliance and the services provider must provide a Corrective Action Plan (CAP) for all Findings.

Concerns identify a potential risk to our local area and may result in a future Finding if not addressed. Concerns do not indicate that our local area is out of compliance and recommendations will be provided to improve services.

**BASIC MONITORING REVIEW ELEMENTS
SERVICES PROVIDERS CONTRACT MONITORING**

Effective Date: October 5, 2016

Revised: February 9, 2017

Overview

The following basic monitoring elements will be reviewed for compliance with the contract, as well as compliance with State, federal and Opportunity Inc. policies and rules. The scope of the monitoring review may be expanded and/or additional monitoring review elements may be added during the conduct of the monitoring review if required. Documentation for the review of each element will be maintained in the monitoring file.

Element 1 – Participant Records

Focus Areas: Eligibility determination, verification and documentation; case notes; Individual Service Strategy (ISS) or Individual Employment Plan (IEP) development, reviews and updates; participant attendance; assessment; confidentiality of participant records; participant service referral and tracking.

Element 2 – Service Delivery

Focus Areas: Contract proposal; participant services provided by the contractor and/or provided by another organization; participant outreach, recruitment and selection; participant incentives; staff and participant interviews; programmatic policies and procedures; work experience/internship site development; partnerships with other organizations; relationships with employers, where applicable; physical program services facility(s); staffing.

Element 3 – Fiscal Management

Focus Areas: Allowable costs; adherence to budget line items; invoice selection and testing; equipment, program income, cost allocation: audit report and requirements; accuracy and timeliness of fiscal billing/reporting.

Element 4 – Performance Metrics

Focus Area: Analysis of actual participant performance outcomes related to contractually specified and applicable DOL, VCCS, and CRWIG Performance Indicators.

Element 5 – Participant Reporting

Focus Areas: Accuracy and timeliness of designated participant case management system entries and reports submitted to CRWIG; assigned staff and related training; documentation for reported participant DOL, VCCS, and CRWIG Performance Indicators; and documentation for reported participant global exclusions.

Element 6 – Internal Controls and Administrative Practices

Focus Areas: Fiscal management; participant eligibility; records maintenance and data validation; service delivery; participant performance tracking.

Element 7 – Compliance with Equal Opportunity Section 188 and Related Grievances

Focus Areas: Visible postings; assigned staff; participant notification.

References: Workforce Innovation and Opportunity Act Final Rule: 20 CFR 683.220 and 683.410