

# SW WIB Sub-State Monitoring Plan

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The Southwest Region Workforce Innovation Board implements *DWD Issuance 16-2015 Sub-State Monitoring Policy* designated under the Workforce Innovation and Opportunity Act (WIOA).

WIOA Section 107(d)(8) [20 U.S.C. 3122(d)(8)] mandates **program oversight** responsibilities that, in partnership with the Chief Elected Official (CEO), are inherent functions of the Local Workforce Innovation Board (Board) serving an Area:

*The local board, in partnership with the chief elected official for the local area, shall—*

*(A)(i) conduct oversight for local youth workforce innovation activities authorized under section 129(c), local employment and training activities authorized under subsections (c) and (d) of section 134, and the one-stop delivery system in the local area; and (ii) ensure the appropriate use and management of the funds provided under subtitle B2 for the activities and system described in clause (i); and*

*(B) for workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcomes under section 116.3*

Subparagraphs A(ii) and B above are WIOA expansions of local oversight responsibilities beyond the previous requirements under the Workforce Investment Act of 1998 that are retained in subparagraph A(i) above.

Further, U.S. Department of Labor (USDOL) regulations, at 20 CFR 683.410(a) as proposed, require:

*(a) Each recipient and sub recipient of funds under title I of WIOA and under Wagner-Peyser must conduct regular oversight and monitoring of its WIOA and Wagner-Peyser program(s) and those of its sub recipients and contractors as required under title I of WIOA and Wagner-Peyser, as well as under 2 CFR part 200, including 2 CFR 200.327, 200.328, 200.330, 200.331, and Department exceptions at 2 CFR part 2900, in order to:*

*(1) Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the Act and the regulations in this part;*

*(2) Determine whether there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations;*

*(3) Assure compliance with 2 CFR part 200; and*

*(4) Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of sec. 188 of WIOA, including the Assistive Technology Act of 1998 (29 U.S.C. 3003).*

The Workforce Innovation and Opportunity Act (WIOA) mandates that the Boards, in partnership with the Chief Elected Officials (CEO), have responsibility for program oversight [referenced in WIOA section 107(d)(8)]. Monitors must submit an annual report each Program Year so the Boards and CEOs can make appropriate judgments.

The Division of Workforce Development (DWD) requires annual monitoring reports to the Boards and CEOs regarding **compliance** with the terms and conditions of each contractual scope of work. Monitors also must provide subcontractor and Area **performance** reviews to the Boards and CEOs on an annual basis.

The SW WIB Operations Manager/EO Officer and the SW WIB Quality Assurance/Projects Coordinator (EO Support) shall conduct monitoring procedures for all program compliance, during the grant period, to assure accountability and transparency of expenditures. The SW region does not serve as the one-stop operator, therefore a conflict of interest in monitoring itself does not apply.

A comprehensive review of WIOA Adult, Dislocated Worker and Youth Programs, including new Youth requirements in WIOA such as OSY 75% expenditures, 20% work-based learning with educational component, 5% limit on IS enrolled "Requires additional assistance: barrier, 5% over income exception, and new eligibility criteria and barriers.

In addition to WIOA Formula Programs reviews will be completed on any stand-alone summer youth programs and any other special initiatives, such as DWGs, to ensure these programs are also administered in accordance with contractual scopes of work. EO monitoring will be completed in conjunction with program monitoring as to avoid duplication of job duties.

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## Initial Review of New Programs

- An initial monitoring will be conducted within two weeks of the beginning program date and receipt of a new program scope of work, including stand-alone summer youth programs or other special initiatives.

## Prior to Monitoring:

- Examine Scope of Work for each program in preparation of review
- Preview of previous Federal, State and local reviews and corrective measures taken to address those issues.

## Notification of Review

The program operator shall be notified of the intended dates of scheduled monitoring prior to the date of the visit whenever possible. The SW WIB reserves the right to conduct unscheduled monitoring reviews at anytime.

## Methodology

Boards must use random-sampling techniques in participant file reviews to test **eligibility in every funding stream for which they have a contract with DWD.**

## Universe Sample Size

The following sample sizes are required at a minimum depending on the universe to be reviewed. The sample size should be applied to participant files from every funding source covered by the subcontract.

1–200	69	501–1,000	96
201–300	78	1,001–2,000	100
301–400	84	2,001–10,000	105
401–500	87		

This table is for a random sampling with a confidence level of 90 percent and a margin of error of 8 percent.

## Monitoring Report

The monitoring team shall produce a written monitoring report for each program operator, which will outline at a minimum:

- the activities which were monitored;
- the systems which were monitored;
- individual participant files which were found to contain errors;
- worksites and training sites which were visited;
- monitoring findings; and
- recommended corrective action

## Response to Monitoring Reports

The Program operator responses will be reviewed and a final report will be prepared outlining any questions, comments or further recommendations the SW WIB staff may have. Annual reports and performance reviews will be submitted the Board and Cleo. The Board may want to consider this information when reviewing eligibility for and recommending the selection of Title I Program Operators, One-Stop Operators and operators of other programs assigned to the Board. Any findings will result in required corrective action plans submitted to the Administrative Entity within 30 days after the program operator receives the written report.

## Corrective Action

Any findings from the written monitoring report will result in required corrective action plans submitted to the Operations Manager/EO Officer within 30 days after receipt of the written monitoring report. The findings along with the corrective action plan will be submitted to the Director who will present to the Board.

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## **Program Monitoring will include:**

WIOA Career-level –only enrollments (Membership), and an additional statistically valid sample of Adult and Dislocated Worker participants enrolled in any of the following services:

- Classroom Training
- On-the-Job Training
  - Training plan and appropriateness of training
  - Compliance with state and federal guidelines,
  - Description of skills
- Work experience/Internship
  - Same as OJT
- Supportive Services/Needs-related payments
- Any other service that results in a direct payment being made to, or on behalf of, a participant
- Appropriate signatures on both the contract and training plan
- Time and attendance records
- Interview of supervisor and participant

## **In addition to:**

- Verification to ensure compliance with the approved Local and State policies, WIOA statutes, and other Federal Laws and regulations including, Fair Labor Standards Act, Child Labor provisions, and the American with Disabilities Act, etc.
- Documentation of any barriers to employment
- Documentation of participant eligibility and/or priority for the programs and services received;
- Orientation of the participant to his/her rights under complaint and grievance procedures;
- Justification for the provision of Individualized Career Services or Training services;
- Documentation of participant priority for the program and services received
- Orientation to services and his/her rights under complaint and grievance procedures
- Data validation
- Appropriate documentation used to verify employment and attainment of degree, diploma or certificate
- Service Notes - Justify services, explain customers situation and do not contain inappropriate information - per DWD Issuance 09-2015.
- Adequacy of assessment
- WIOA Program Activities and Services/funding source
- Coordination with One-stop partners to meet comprehensive needs of customers
- Customer Outcomes
- Individual Employment Plan (when applicable) or Individual Service Strategy
- Individual Training Plans,
- Appropriateness of Services
- Method of Assessment and results
- Educational status and highest grade completed, Reading and math levels
- NGCC processes, the quality of services delivered and continuous improvement.

## **NGCC Staff Interview**

- Coordination of services
- Continuous improvement
- LMI system and data
- Availability of resources
- Record keeping and reporting, including participant tracking
- Determination of Adults and Dislocated Workers in Need of Intensive and Training Services
- Job development
- Assessment and IEP/ ISS development
- Complaint and Grievance process

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## **EO Review**

- Hiring practices, promotion practices, outreach and intake procedures in compliance with the Equal Employment Opportunities and Americans with Disabilities Acts.
- Monitoring and investigating the recipient's activities, and the activities of the entities that receive WIOA Title I funds from the recipient, to make sure that the recipient and its sub-recipients are not violating their nondiscrimination and equal opportunity obligations under WIOA Title I and this part;
- Reviewing the recipient's written policies to make sure that those policies are nondiscriminatory;
- Complaint and Grievance process
- The review of records should indicate that compliance with policies and procedures for nondiscrimination and equal opportunity in the development of job training plans are being followed

**Observation of facility:** A complete tour of the Missouri Jobs Centers will be conducted to assess the adequacy of the facility as it relates to the accessibility to the site, activities and programs by persons with disabilities and compliance with Americans with Disabilities Act. Observation that the center is comfortable and is a safe and healthy environment for customers and staff. That sufficient staff, resources, and equipment to deliver WIOA services are present and in proper working order.

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## **SW WIB Fiscal Monitoring**

The SW WIB Fiscal Operations Coordinator, shall review all new requirements under the Uniform Guidance<sup>5</sup> for sub-state monitoring according to federal cost principles and audit requirements. This includes requiring an examination of recipient and sub recipient non-discrimination and conflict-of-interest policies, and mandatory disclosures of all violations of federal criminal law involving fraud, bribery or gratuity violations potentially affecting the federal award.

The WIB Fiscal Coordinator will conduct an annual on-site Financial Monitoring Review of sub recipients to ensure fiscal integrity. Additional reviews may be warranted based on evaluations of risk of noncompliance. The FMR will be performed to comply with WIOA section 184(a)(4) [29 U.S.C. 3244(a)(4)], annual DWD agreements, and 2 CFR Part 200 and Part 2900. This Review is to ensure the adequacy of internal controls and the reliability of the sub recipient's financial management system as they relate to the administrative sub award. This Review must ensure that the sub recipient meets the terms and conditions of the sub award and the fiscal goal or requirements, and that amounts reported are accurate, allowable, supported by documentation and properly allocated. The Review must result in a written report to the Board identifying areas of noncompliance and recommendations to remedy. The FMR must include, but is not limited to, reviews of the following process:

- Audit Resolution/Management Decision
  - Financial Reports
  - Internal Controls
  - Source Documentation
  - Cost Allocation
  - Cash Management
  - Procurement

## **If applicable (due to contract):**

- General Ledger/Trial Balance
- Detailed listing of transactions to support expenses reported on the "General Ledger Trial Balance"
- Detailed listing of transactions to support accruals reported
- Check register
- Bank Statements and Reconciliations
- Supportive Services Policy
- Supportive Service and Training documentation to include schedule of obligations
- Detailed listing of transactions to support "Administrative Expense" as reported
- Chart of Accounts
- Organizational Chart
- Copy of personnel and financial policies and procedures manual
- Travel Policy
- Record Retention Policy
- Confidentiality Policy
- Cost allocation
- Copy of current insurance coverage's for employee bonding/ theft and D&O
- A review and interview to ensure that staff is following the proper guide for determining costs applicable to WIOA (OMB Circular) and WIOA procurement guidelines;
- Review of one or more personnel records paid through contracts with the SW WIB

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