

Oversight and Monitoring Policy #P-5-3.22

Date: August 8, 2022

Re: Guidance on Title I oversight and monitoring.

Approved: May 12, 2022

Effective: May 12, 2022

References: WIOA Section 107 (d) (8)
WSP No. 07-2015
WSP No. 03-2015
WSP No. 183-01, Change 1
WSP – WIOA Performance Reporting
TEN 49-11
20 CFR Part 683.410
Financial Management Guide PA Department of Labor & Industry

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I. Purpose:

- A. The purpose of this policy is to provide direction regarding the South Central Workforce Development Board's (SCPa Works) approach to the oversight of the workforce administration, funds and programs.
- B. The Oversight and Monitoring Policy will insure SCPa Works and its contracted subrecipients are in compliance with the Workforce Innovation and Opportunity Act (WIOA).

II. Background:

- A. South Central Workforce Development Board (SCPa Works), in partnership with the chief elected officials, must conduct and document complete and regular oversight of Title I activities, and routinely oversee the activities of the subrecipients which receive public funds administered by the PA Department of Labor & Industry. Oversight must include review of both the uniform administrative and fiscal requirements and program performance of the entities administering and delivering services. These activities must be designed to ensure:
 - 1. Compliance with federal, state, and local requirements;
 - 2. That the Title I programs achieve intended results; and
 - 3. That grant funds and other assets are adequately safeguarded.

III. Policy:

- A. The South Central Workforce Development Board (SCPa Works), in partnership with the chief elected officials, shall:

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1. Conduct oversight for local adult and youth workforce development activities, local employment and training activities, and the one-stop delivery system in the local area;
2. Ensure the appropriate use and management of funds provided for the activities and system; and
3. For workforce development activities, ensure appropriate use, management, and investment of funds to maximize performance outcomes.

IV. Oversight Activities:

- A. Oversight activities will include monitoring and assessing each subrecipient's compliance with applicable federal, state, and local laws, regulations, contract provisions/grant agreements, policies, and official directives and compliance with the appropriate uniform administrative requirements for grant and agreements applicable to the type of entity receiving funds.
- B. Oversight activities will encompass both uniform administrative requirements and programmatic monitoring.

V. Methodology:

- A. Monitoring is a process of collecting and analyzing data for the purpose of addressing oversight of programmatic and fiscal activities, administrative systems, and management practices to determine if such activities, systems, and practices are appropriate, effective, and in compliance with contractual terms, federal statutes and regulations, state laws, directives and policies; and other requirements upon which the release of funds is conditioned.
- B. The following activities may be utilized in the local oversight process:
 1. On-site visits will be comprised of fiscal and programmatic monitoring to ensure all funds allocated to the local workforce development area are adequately safeguarded, program performance levels are met, and local subcontractors are programmatically, operationally, and fiscally compliant.
 2. Desk reviews will be comprised of reviews of programs and related financial and participant data to test compliance to identify potential or recurring problems to prepare for more in-depth on-site visits, and to conduct more systematic and continuous oversight.
 3. Random sampling reviews will consist of reviewing a select, pre-defined volume of samples at random to be used to help identify compliance violations, questioned costs, and/or potential weaknesses in performance.
 4. Surveys will consist of SCPa Works surveys to help identify compliance violations, questioned costs, or potential weaknesses in performance, as well as to capture promising practices or a need for technical assistance.
- C. Monitoring, evaluation, and audits may also include one or more of the following activities:
 1. Risk assessments to select most likely non-compliant contracted service provider;
 2. Review of audits;
 3. Review of fiscal controls and accounting;
 4. Review of fiscal and programmatic records and documents;
 5. Review of program activities;
 6. On-site review of records, documents and observe operations;
 7. Staff interviews;
 8. Review of performance;
 9. Desk reviews of reports and statistics;
 10. Review of contracted service provider's oversight plan, method and activities; and
 11. Technical assistance.

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- D. During the transfer and review of Title I files, sites, staff members, and programs, all participant data and any other data that contains Personally Identifiable Information (PII) must be handled as per the SCPa Works PII Policy #P-3-3.22

VI. Tools:

- A. The tools developed to monitor Title I activities will reflect the requirements of each of the funding streams to include:
 - 1. Name of agency;
 - 2. Date of compliance monitoring;
 - 3. Service or activities provided;
 - 4. Total amount of contract and sources of funding;
 - 5. Date(s) of oversight activities;
 - 6. Staff interviewed; and
 - 7. Summary of the results that include program strengths, concerns, deficiencies and areas where technical assistance may be needed.

VII. Technical Assistance:

- A. Technical assistance may include but is not limited to training provided to subrecipients, discussion of areas of concern, evaluation of program operation, or any combination.
 - 1. The SCPa Works Policy Department, in conjunction with this policy, will provide to subrecipients a minimum of four quarterly technical trainings on an annual basis.
- B. Technical assistance may also occur during oversight activities.

VIII. Schedule and Timeline:

- A. Oversight will be conducted on a continuous basis by breakdown of methodology and within direct adherence to the Pennsylvania Department of Labor and Industry monitoring and oversight requirements, quarterly reporting mandates, and annual reviews.
- B. Multiple on-site compliance visits, by way of breakdown of methods, will be performed during the agreement period or program year (July 1-June 30), and more often if the risk assessment method indicates a service provider to be within a high risk classification.
 - 1. Contracted service providers will be classified as either high risk, medium risk or low risk for the purposes of the methods of monitoring utilized.
- C. SCPa Works has the discretion to increase monitoring frequency and/or to conduct specialized oversight activities to investigate allegations of mismanagement, to clarify unusual findings, or for other reasons as warranted.

IX. Reporting Requirements and Corrective Guidance:

- A. Copies of all oversight reports will be maintained to document monitoring reviews.
- B. Oversight results will be made available for state and/or federal review upon request.
- C. Oversight reports, including the tools used to complete oversight activities will be made available to the executive staff of SCPa Works and all additional staff members.
- D. When necessary, and when it is deemed effective, a corrective action plan (CAP) will be issued to contracted service providers by the SCPa Works Policy Department to rectify high-risk findings that are identified during a monitoring activity.
 - 1. Reference the SCPa Works Risk Assessment and Corrective Action Policy #P-23-4.22 for further guidance concerning corrective action issuances and plans.

X. Controls:


- A. The SCPa Works Policy Department will perform an annual evaluation of the LWDB oversight function to determine the effectiveness of processes and procedures.

- B. SCPa Works will require periodic reports from the contracted service providers outlining monitoring reviews, noncompliance issues, and the status of corrective actions.
- C. SCPa Works will ensure that a summary regarding oversight activities and findings is provided to the local workforce development executive board, or appropriate standing committee of LWDB.

XI. Oversight and Monitoring of OJT and ITA Contracts:

- A. OJT and ITA contracts will be monitored based on risk assessment evaluations.
 - 1. If a vendor is a new contractor in the new program year, the vendor will be required to have a compliance visit conducted.
 - 2. If a vendor is a contractor from the prior year, and has been monitored with no compliance issues, and scored low on a risk assessment evaluation in the new year, they do not need to be monitored again for the new or existing year.
 - 3. If a vendor has scored within a high risk range during a previous monitoring activity, they will be required to be monitored again for the new or existing program year.
 - 4. All vendors (contracted service providers) will be monitored at least every other program year regardless of risk assessment evaluation outcomes.
- B. Discretionary contracts will be monitored based on risk assessment evaluation outcomes to the discretion of the SCPa Works Compliance Department.

XII. Summary of Changes: This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
08/08/2022	Saranne Miller 	1. Edited footnote to reflect 180-day revision cycle. 2. Added quarterly technical trainings to Sec. VII. 3. Edited the language in Sec. XI to reflect the term "vendor."	08/08/2022