

Oversight and Monitoring Policy #P-5-3.22

Re: Guidance on WIOA Title I, TANF, and EARN oversight and monitoring.

Originated: May 1, 2022
Approved: May 12, 2022
Reviewed for Updates: March 6, 2025
Revision Approved: May 1, 2025

References: WIOA Section 107 (d) (8)
WORKFORCE SYSTEM POLICY (WSP) No. 07-2015
WORKFORCE SYSTEM POLICY (WSP) No. 03-2015
WORKFORCE SYSTEM POLICY (WSP) No. 183-01 (C1)
WORKFORCE SYSTEM POLICY (WSP) No. – WIOA Performance Reporting
TEN No. 49-11
20 CFR Part 683.410
Financial Management Guide PA Department of Labor & Industry

Author: Saranne Miller, SCPa Works Policy Manager



Attachments: ATTACHMENT I: SCPa Works Oversight and Monitoring Review Schedule
ATTACHMENT II: SCPa Works Fiscal Monitoring Tool

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 and monitoring of workforce administration, funds, and programs.
- B. This Oversight and Monitoring Policy will ensure 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:

SCPa Works Oversight and Monitoring #P-5-3.22 ~ SCWDB Approved 05.01.2025.

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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 encompass both uniform administrative requirements and programmatic monitoring.
- B. SCPa Works ensures compliance with applicable federal, state and local laws and regulations, as well as contract provisions, policies, official directives and grant agreements. The board's oversight responsibilities include, but are not limited to, the following:
 - i. Administrative Oversight.
 1. local governance
 2. local plans and agreements
 3. local board compliance and certification
 4. PA CareerLink® certification
 5. organizational structure
 6. administrative policies and procedures
 7. sub-recipient capacity to provide oversight
 8. Americans with Disabilities Act (ADA) compliance
 9. non-discrimination and civil rights provisions
 10. equal opportunity requirements
 11. PA Sunshine Act compliance
 12. Right-to-Know law compliance
 - ii. Programmatic Oversight.
 1. program management and standards
 2. program policies and procedures
 3. service delivery
 4. access to services
 5. participant eligibility
 6. performance measures and program outcomes
 7. services to priority and special populations
 8. record retention and case file maintenance
 9. sub-recipient monitoring activities
 10. supportive services and need related payments
 11. youth activities
 12. data analysis
 13. data element validation
 - iii. Fiscal Oversight and Reporting.
 1. fiscal agent responsibilities and activities
 2. fiscal policies and procedures
 3. fiscal plans and agreements
 4. sub-recipient monitoring activities
 5. cost allocation and allowability
 6. resource sharing
 7. cash management practices

8. procurement practices
9. internal controls
10. reporting requirements
11. closeout procedures
12. audits
13. sub-contract compliance
14. program income and reporting
15. property management
16. record retention
17. Generally Accepted Accounting Principles (GAAP) adherence
18. payroll administration

V. Monitoring Plan and 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. SCPa Works utilizes the following methods in the local oversight plan and process:
 1. On-site visits include fiscal and programmatic monitoring to ensure that all funds allocated to the local workforce development area are adequately safeguarded, program performance levels are met, and local subcontractors are programmatic, operationally, and fiscally compliant.
 2. Desk reviews involve reviewing programs and related financial and participant data to test compliance, identify potential or recurring problems, prepare for more in-depth on-site visits, and conduct more systematic and continuous oversight.
 3. Random sampling reviews consist of reviewing a select, pre-defined volume of samples at random to help identify compliance violations, questioned costs, and/or potential weaknesses in performance.
 4. Surveys 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 also include but are not limited to the following activities:
 1. Risk assessments to select the most likely non-compliant contracted service provider;
 2. Review of fiscal controls and accounting;
 3. Review of fiscal and programmatic records and documents;
 4. Review of program activities;
 5. On-site review of records and documents, and observation operations;
 6. One-Stop Operator (OSO) and administrative staff interviews;
 7. OSO compliance and separation of duties review;
 8. Program performance reviews via case record file reviews, ITA/OJT/PWE reviews;
 9. Desk reviews of CWDS data, case notes, and data element validation;
 10. Reviews of contracts, MOU's and additional binding documentation;
 11. Equal Opportunity Compliance reviews;
 12. TANF Youth program, fiscal, and case records review;
 13. EARN program, fiscal, and case records review;
 14. PA CareerLink® site reviews;
 15. Employer interviews and worksite reviews;
 16. Review of contracted service provider's oversight plan, method, and activities; and

17. The provision of technical assistance to contractors and subcontractors who fall under corrective action due to non-compliant findings.

- 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.
- D. ATTACHMENT I of this policy reflects the annual Program Year general monitoring schedule overseeing WIOA Title I Adult, Dislocated Worker, and Youth programs, the EARN program, and the TANF Youth program to include a schedule of Risk Assessments performed on all contracted Service Providers at a minimum of annually.

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 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. Fiscal Review

- A. A fiscal audit is conducted annually by a third-party contractor that monitors and reviews the LWDB fiscal operations, administration, and activities.
 - i. This audit is a formal inspection performed by an independent, public accountant in accordance with the Generally Accepted Government Auditing Standards covering financial audits, which includes thresholds, timeframes, auditor selection responsibilities and reports consistent with applicable federal, state and local statutes, regulations, policies and the terms and conditions of any applicable awards and sub-awards.
- B. SCPa Works conducts fiscal reviews of WIOA Title I, EARN, and TANF Service Providers as reflected in Attachment I of this policy, the SCPa Works Oversight and Monitoring Review Schedule.
- C. SCPa Works utilizes Attachment II of this policy, the SCPa Works Fiscal Monitoring Tool, to conduct Service Provider monitoring activities across WIOA, EARN, and TANF programs based on the attached Oversight and Monitoring Review Schedule.

XIII. Corrective Action Identification:

- A. SCPa Works identifies risk within Title I service administration and operations through the astute act of conducting data reviews and producing results that comprehensively inform the frequency and manner in which risk is identified, assessed, and resolved.

- B. Corrective action will be taken when a contracted subrecipient fails to meet compliance or performance in any of the following areas:
1. Disallowed costs;
 2. Missing program and/or contractual requirements;
 3. Breach of PII;
 4. Operating outside the perimeters of WIOA Federal, State, and local regulatory compliance;
 5. Fiscal integrity to include invoicing, record keeping, documentation, and reporting;
 6. Operational compliance;
 7. Personnel and staffing requirements;
 8. Breach of contractual agreements with any or all workforce partners and ETPs;
 9. Mismanagement of contract(s);
 10. All aspects of physical record file management and CWDS data entry accuracy;
 11. All aspects of WIOA Title I enrollment and eligibility requirements;
 12. Any additional components, elements, aspects, and/or activities surrounding subrecipient accountability across WIOA-funded initiatives and programming.

XIV. Corrective Action Procedures

- A. All points of risk identified within the operations and administration of contracted service provider activities, and documented during a monitoring procedure, will be subject to one or more of the following elements strictly enforced by SCPa Works:
1. **LEVEL 1; Requirement for Technical Assistance:** The SCPa Works Compliance Department identifies the finding, determines the finding to pose a risk, and recommends the provision of technical assistance or additional guidance when a deficiency or discrepancy results in a finding due to inadequate information or training.
 - a. The compliance officer will determine the need for technical assistance and include the necessity in the final, comprehensive monitoring report submitted to the Programs Department.
 - b. The compliance officer will refer the finding(s) to include the comprehensive monitoring report to the SCPa Works policy manager.
 - i. The policy manager will schedule an educational or training session with the service provider who has indicated risk.
 - ii. The service provider will have 10 days to response to the correspondence and formally schedule the training with policy manager.
 - c. The education or training session led by the SCPa Works policy manager will take place within 30 days of the date of the recorded finding(s) and include an action plan to which the service provider will adhere.
 - i. The education or training elements may also be incorporated into or added to an SCPa Works Quarterly Policy Training session to serve as the corrective action required to resolve and eliminate the specified risk.
 - d. All elements included in the corrective action plan, developed by the policy manager in collaboration with the Programs and Compliance Departments, will be recorded and tracked using the shared SCPa Works Corrective Action Log, maintained by the policy manager.
 - e. Follow-up monitoring on the specified risk element will be implemented by the compliance officer and take place once every 30 days across a 180-day (sixth-

month) period from the date of the completed education or training session provided by the policy manager.

- i. All follow-up initiatives and results will be collectively recorded and tracked by the policy manager on the SCPa Works Corrective Action Log.

2. **LEVEL 2; Requirement for Internal Policy/Procedural Changes:** The SCPa Works Compliance Department will identify a finding as habitual or repetitive due to the lack of a process, a non-effective procedure, or poorly structured leadership within the subrecipient organization, and will recommend procedural changes to result in improved and acceptable performance.

- a. The SCPa Works Compliance Department will determine that the contracted service provider must create improved standard operating procedures (SOPs) to account for the identified risk, and the Compliance Department will include this necessity in the final, comprehensive monitoring report.
- b. The Compliance Department will submit the monitoring report to the policy manager for corrective action plan development and implementation.
- c. All elements included in the corrective action plan, developed by the policy manager in collaboration with the Programs and Compliance Departments, will be recorded and tracked using the SCPa Works Corrective Action Log.
- d. The policy manager will detail the corrective action plan via written correspondence to the subrecipient.
 - i. The subrecipient will have 10 days to response to the request for corrective action.
- e. The subrecipient will be given 30 days from the day of the compliance officer's monitoring review to submit a plan for a new or improved standard operating procedure (SOP) for approval to the policy manger.
 - i. The new or improved SOP must include an action plan indicating the following points of interest to be reviewed for a 180-day (sixth month) period:
 1. Anticipated project timeline
 2. Titles of the designated staff members who will carry out tasks during the SOP development and implementation periods
 3. Titles of the staff members who will be accountable for the oversight and monitoring of the new or improved SOP.
 4. A detailed plan to introduce the new or improved SOP to the subrecipient organization as a whole.
 5. A method of tracking organizational improvements directly related to the new or improved SOP.
 6. Title of the point-of-contact staff member who will regularly communicate project progress, setbacks, and accomplishments through scheduled meetings, phone calls, and email correspondence with the SCPa Works policy manager.
 - ii. The policy manager will collaborate with the Programs and Compliance Departments on plan revisions, suggestions, and ultimate SCPa Works approval.
- f. Follow-up monitoring on the specified risk element will take place by the compliance officer once every 30 days across a sixth-month period from the date of SCPa Works approval on the new SOP.

- i. All follow-up results will be recorded and tracked by the compliance officer and the policy manager on the SCPa Works Corrective Action Log.
3. **LEVEL 3; Requirement for Formal Corrective Action & Monitoring:** The SCPa Works Compliance and Policy Departments will identify findings as severe due to the subrecipient's action or non-action having resulted in the loss of funds, and/or effecting overall program outcome, and will recommend the creation of a formal corrective action plan to address programmatic short-comings and discrepancies over a period of time that extends beyond the standard 180-day follow-up period.
 - a. Contracted Title I service providers within the SCPa Works service area that pose a large volume of documented risks, frequented or repeated risks, and/or risks identified outside of standard monitoring procedures that have resulted in monetary losses or a reduction in program targets will be subject to Formal Corrective Action.
 - b. Formal Corrective Action will prompt a special meeting comprised of the SCPa Works Programs Department, Compliance Department, Policy Department, the Chief Operating Officer, and the Fiscal Department if necessary.
 - c. Formal Corrective Action requirements will be unique to the risk assessment, the findings, the compliance reports, and the overall performance history of the contracted service provider.
 - d. The Formal Corrective Action will be authored and issued by the Policy Manager, and based on unanimous decisions of all departments involved.
 - e. The basic and necessary purpose of a Formal Corrective Action is to ensure that the contracted service provider is receiving all components of training, education, and technical assistance from the LWDB, and to permanently resolve and correct all programmatic discrepancies.

XV. SCPa Works Program Year Monitoring Schedule



- A. The following grid reflects the SCPa Works Program Year Monitoring Schedule. The schedule is subject to change from program year to program year; however, the grid provides the LWDB, the Bureau of Workforce Development Administration (BWDA), and subcontractors an annual map of elements reviewed by the SCPa Works Compliance team.
- B. Monitoring Schedule as detailed in **ATTACHMENT 1** at the end of this policy.

XVI. Dispute Resolution

- A. The dispute resolution is a process designed for use by the Service Providers when they are unable to successfully reach an agreement necessary to execute and implement a corrective action plan.
 - i. This is separate from the SCPa Works Customer Grievance and Complaint Policy.
- B. A disagreement is considered to have reached the level of dispute resolution when an issue arises out of the development and negotiation of a Corrective Action that is not easily coming to a point of resolution.
- C. It is the responsibility of the Service Provider to issue communication via email correspondence to the Director of Programs to initiate and coordinate a dispute resolution to ensure that issues are being resolved appropriately.
- D. The following reflect points of interest surrounding a dispute in relation to a Corrective Action against a Service Provider that cannot be implemented by the Service Provider:

- i. All Parties are advised to actively participate in negotiations in a good faith effort to reach agreement. Any disputes shall first be attempted to be resolved informally.
- ii. Should informal resolution efforts fail, the dispute resolution process must be formally initiated by the petitioner seeking resolution. The petitioner must send a notification to the SCPa Works Director of Programs regarding the conflict within 30 business days of the issuance of the Corrective Action.
- iii. The SCPa Works Director of Programs shall place the dispute on the agenda of a special meeting of the Local WDB's Executive Committee. The Executive Committee shall attempt to mediate and resolve the dispute. Disputes shall be resolved by a 2/3 majority consent of the Executive Committee members present.
- iv. The decision of the Executive Committee shall be final and binding unless such a decision is in contradiction of applicable State and Federal laws or regulations governing the Partner agencies.
- v. The right of appeal no longer exists when a decision is final. Additionally, final decisions will not be precedent-setting or binding on future conflict resolutions unless they are officially stated in this procedure.
- vi. The Executive Committee must provide a written response and dated summary of the proposed resolution to the Service Provider.
- vii. The SCPa Works Director of Programs will contact the petitioner and the appropriate Parties to verify that all are in agreement with the proposed resolution.

XVII. 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 	<ol style="list-style-type: none"> 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
03/07/2025	Saranne Miller 	<ol style="list-style-type: none"> 1. Added "SCPa Works Oversight and Monitoring Review Schedule" as Attachment I to reflect the relevance of the tool in SCPa Works oversight and monitoring practices. 2. Added "SCPa Works Fiscal Monitoring Tool" as Attachment II to reflect the relevance of the tool in SCPa Works oversight and monitoring practices. 3. Revised Section V to reflect the SCPa Works Monitoring Plan, the SCPa Works Monitoring Schedule, and in reference to the SCPa Works Risk Assessment Policy in compliance with the Bureau of Workforce Development Administration, South Central Local Workforce Development Board 	05/01/2025

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		<p>Compliance and Oversight and South Central Local Workforce Development Area Fiscal and Procurement Systems Analysis and Review for Program Year 2023 (PY23) for LWDBs to develop and implement policies that contain a specified Monitoring Plan and Monitoring Schedule.</p> <ol style="list-style-type: none"> 4. Added EARN and TANF to the narrative throughout the policy to reflect the newly adopted SCPa Works monitoring practices of EARN and TANF programmatic and operational systems. 5. Added Sections VII & VIII to enhance the definition and implementation of corrective action plans with oversight and monitoring, and in reflection of removing corrective action practices from the Risk Assessment policy. 6. Added Sections XIII and XIV in compliance with the Bureau of Workforce Development Administration that LWDBs develop and implement a Corrective Action Plan in direct relation to WIOA Title I Oversight and Monitoring practices. 7. Added Section XV to reflect the requirement that LWDBs develop, implement, and publish a Program Year Monitoring Schedule listed as Attachment I in this policy. 8. Added Section XII to fulfill the BWDA requirement that LWDBs include fiscal monitoring practices and tools as a part of the oversight and monitoring policy. 9. Added Section XVI at the request of the BWDA that a conflict resolution process be included in the Oversight and Monitoring policy. 10. Added Section IV(C) to enhance the clarity surrounding oversight and monitoring line items per area of review. 	
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ATTACHMENT I:

PY24-25 MONITORING SCHEDULE

SCPa Works Oversight and Monitoring Policy #P-5-3.22

SCPa Works Risk Assessment Policy #P-23-4.22

Monthly Schedule	Grant Element/Program/Entity/Contract/Subcontractor	Compliance Activity	Date of Review Initiation	Date of Review Completion	Notes:
July	Equal Opportunity	EO Log Due			
	TANF Youth	Virtual File Review			
	EARN Program	Policies and Procedures			
	EARN Subcontractor	Case Records Review			
	EARN Subcontractor	Fiscal			
	TANF Summer Earn & Learn PWE	Worksite Visits/File Reviews			
	WIOA Title I Subcontractors	Risk Assessment Review			Contingent on previous score
August	Equal Opportunity	LWDB OEO Request (?)			
	WIOA Title I Youth Program	In-Person Case Record File Review			
	WIOA Title I Youth Subcontractor	Policies & Procedures Review			
	WIOA Title I Youth Subcontractor	Fiscal Review			
	TANF Youth	Virtual File Review			
	Summer Earn & Learn PWE	Worksite Visits/File Reviews			
	WIOA Title I Youth Program	Self-Attestation Review			
Sept.	Equal Opportunity	EO Office Review Corrections Due (?)			
	TANF Youth	Virtual File Review			
	WIOA Title I Adult, DW, & Youth	File Archive			
	WIOA Title I Adult/DW Program	In-Person Case Record File Review			
	WIOA Title I Adult/DW Subcontractor	Policies & Procedures Review			
	WIOA Title I Adult/DW Subcontractor	Fiscal Review			
	WIOA Title I Adult & DW	Self-Attestation Monitoring			
	WIOA Title I ITA/OJT	ITA/OJT In-Person Review			
Oct.	Equal Opportunity	EO Log Due			
	TANF Youth	In-Person Review			
	WIOA Title I Adult, DW, & Youth	File Archive			
	EARN Program	Incentive Monitoring			
	WIOA Title I Subcontractors	Monitoring Tool Review			
	WIOA Title I Subcontractors	Policies and Procedures Review			

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ETPL - ADA & EO Compliance	Site Reviews			
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Nov.	PA CareerLink®	PA CareerLink® Site Reviews			
	One-Stop Operator	OSO Reviews			
	TANF Youth	Virtual File Review			
	EARN Subcontractor	Program Policies and Procedures			
	EARN Subcontractor	In-Person Case Record File Reviews			
	EARN Subcontractor	Fiscal Review			
	WIOA Title I Youth	Incentive Monitoring			
	TANF Youth	Incentive Monitoring			

Dec.	Equal Opportunity	EO 2024 Survey			
	PA CareerLink®	PA CareerLink® Site Reviews			
	One-Stop Operator	OSO Reviews			
	WIOA Title I Youth Program	In-Person Case Record File Review			
	WIOA Title I Youth Subcontractor	Policies & Procedures Review			
	WIOA Title I Youth Subcontractor	Fiscal Review			
	TANF Youth	Virtual File Review			
	WIOA Title I ITA, OJT	ITA/OJT In-Person Review			

Jan.	Equal Opportunity	EO Log Due			
	TANF Youth	Virtual File Review			
	WIOA Title I Adult/DW Program	In-Person Case Record File Review			
	WIOA Title I Adult/DW Subcontractor	Policies & Procedures Review			
	WIOA Title I Adult/DW Subcontractor	Fiscal Review			
	WIOA Title I Subcontractors	Risk Assessment Review			Contingent on previous score

Feb.	TANF Youth	In-Person Review			
	WIOA Title I Youth	Self-Attestation Monitoring			

March	TANF Youth	Virtual File Review			
	EARN Subcontractor	Program Policies and Procedures			
	EARN Subcontractor	In-Person Case Records Review			
	EARN Subcontractor	Fiscal Review			
	WIOA Title I Adult & DW	Self-Attestation Monitoring			

April	Equal Opportunity	EO Log Due			
	WIOA Title I Youth Program	In-Person Case Record File Review			
	WIOA Title I Youth Subcontractor	Policies & Procedures Review			
	WIOA Title I Youth Subcontractor	Fiscal Review			

TANF Youth	Virtual File Review			
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May	TANF Youth	Virtual File Review			
	WIOA Title I Adult/DW Program	In-Person Case Record File Review			
	WIOA Title I Adult/DW Subcontractor	Policies & Procedures Review			
	WIOA Title I Adult/DW Subcontractor	Fiscal Review			

June	TANF Youth	In-Person Review			
	TANF Summer Earn & Learn PWE	Summer Prep			
	WIOA Title I Subcontractors	Risk Assessment Review			Contingent on previous score

SCPa Works Fiscal Oversight & Monitoring Schedule 03.14.2025

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ATTACHMENT II:

Oversight and Monitoring Fiscal Monitoring Tool

Reviewed By: Click or tap here to enter text.

Today's Date: Click or tap to enter a date.

Reviewer's Position with SCPa Works: Click or tap here to enter text.

Program Year: Click or tap here to enter text.

Program Year Quarter: Click or tap here to enter text.

Type of Contract: CHOOSE AN ITEM

Last Review Conducted: Click or tap to enter a date.

Service Provider Company Name: Click or tap here to enter text.

Service Provider Fiscal Contact Name: Click or tap here to enter text.

Service Provider Fiscal Contact Phone: Click or tap here to enter text.

Service Provider Fiscal Contact Email: Click or tap here to enter text.

Fiscal				
		YES	NO	N/A
Have there been changes to the way the fiscal agent manages cash-on-hand since the PY 2021 monitoring? If yes, please explain. <i>WSP No. 03-2015, Financial Management Policy, Financial Management Guide (FMG) 2021, pg. 15</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				
How much cash-on-hand does the LWDB have as of today?				
Explanation:				
		YES	NO	N/A
Did request-for-funds (RFF) cash draws exceed the 2022-2023 FSR reported cumulative expenditures? <i>WSP No. 03-2015, Financial Management Policy, FMG 2015, pg. 2-2</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				
		YES	NO	N/A
Has the LWDB reported known or suspected incidents of fraud, abuse, or waste for PY 2022? (If yes, please provide a brief explanation and attach the incident report) <i>WSP No. 03-2015, Financial Management Policy, Financial Management Guide (FMG) 2021, pg.16</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				

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		YES	NO	N/A
Have LWDB and fiscal agent staff (including non-profit organizations) completed the Commonwealth of Pennsylvania State Ethics Commission, SEC-1, Statement of Financial Interest, for calendar year 2022 (due May 1, 2021)? <i>WSP No. 03-2015, Financial Management Policy, Financial Management Guide (FMG) 2021, pg. 18</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		YES	NO	N/A
Is program income properly reported on appropriate FSRs? <i>WSP No. 03-2015, Financial Management Policy, FMG 2021, pg.25</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		YES	NO	N/A
If program income was generated and reported on the FSR, were program income funds expended appropriately?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				
		YES	NO	N/A
Is program income generated in the PA CareerLink®(s) expended as agreed in the Resource Sharing Agreement (RSAB)? <i>WSP No. 03-2015, Financial Management Policy, FMG 2021, pg. 28</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				
		YES	NO	N/A
What is the date of the most recent LWDB cost allocation plan (CAP)?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				
		YES	NO	N/A
Does the MOU (which includes the Operating Budget and the Infrastructure Costs Agreement) include the required partner signatures on the MOU Authority and Signature Pages? If no, please explain. <i>Local Workforce Delivery System – Memorandum of Understanding – Workforce System Policy - Local Workforce Delivery System – Memorandum of Understanding Guide, pg. 6, pg. 9</i>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explanation:				

SCPa Works Fiscal Oversight & Monitoring Form 03.14.2025
SCPa Works Oversight & Monitoring Policy #P-5-3.22

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This document is reviewed for updates every 180 days by the SCPa Works Policy Department and was last reviewed on 03.06.2025.

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