

JEFFERSON/FRANKLIN CONSORTIUM

**WORKFORCE INNOVATION AND
OPPORTUNITY ACT (WIOA)**

**SUB-STATE MONITORING PLAN AND
POLICY**

Sub-State Monitoring Plan (SMP) Jefferson/Franklin Consortium

As required by the Workforce Innovation and Opportunity Act (WIOA), Jefferson/Franklin Consortium has developed a Sub-State Monitoring Plan (SMP) to effectively execute WIOA program oversight and monitoring requirements. The SMP describes procedures to ensure that the performance of subrecipient providers is in compliance with the terms of grants, contracts or other agreements pursuant to WIOA Title I Workforce Development Activities.

The general mission and function of monitoring is to review and evaluate overall WIOA administration and operation, including the appropriate use, management, and investment of funds to maximize performance outcomes. Monitoring and oversight will function as a management tool for the Local Workforce Development Area (LWDA) that links planning, program design, implementation and evaluation.

Oversight Responsibilities

The Workforce Development Board (WDB), in partnership with the Chief Local Elected Officials (CLEO) is responsible for oversight for local youth workforce investment activities, local employment and training activities, and the one-stop delivery system in the local area.

The Office of Job Training Programs (OJTP) compliance staff performs the oversight functions. The One Stop Coordinator may appoint other staff for selected monitoring responsibilities. Compliance staff maintain a separation of duties and independent from the duties or systems being monitored. Programs are subcontracted and therefore duties are inherently separated.

Compliance staff are thoroughly and continually trained in all phases and technical aspects of WIOA. Staff training is conducted by OJTP personnel, Office of Workforce Development (OWD) staff, Department of Labor (DOL), and other private consultants. Further, program policy issuances, technical guides, monitoring manuals, operational manuals, scopes of work, performance data, and other relevant information is distributed to monitoring staff.

The WDB and Local Elected Officials receive annual monitoring reports from the LWDA Administrative Entity (AE) regarding compliance with the terms and conditions of each contractual scope of work. Subcontractor and area performance reviews are provided to the Boards and CLEOs. Any identified findings are reported promptly and appropriate corrective action steps will be taken. Recommendations and/or technical assistance may be provided as necessary. A comprehensive examination of any compliance issues determined during a federal, state or local review will be conducted to ensure that corrective measures were taken by subcontractors to address those issues and written determination will document that the corrective actions were effective.

Risk Assessment

Prior to issuing an award under WIOA Title I and annually thereafter, the LWDB will conduct a risk assessment to assess the organizations overall ability to administer Federal funds as required under 2CFR 200.205. The results of this risk assessment may result in additional records being added to the sample size.

Monitoring Structure

Reviews will be conducted quarterly and/or ongoing as determined by operational need. Staff will utilize OWD monitoring tools, or a variation of, to complete reviews. Locally developed monitoring tools will be used if OWD does not have a tool for a specific area.

Program monitoring may include, but is not limited to, the following:

- Documentation of participant eligibility - Electronic case management system and File Review
- Accuracy and appropriateness of data entry
- Priority and appropriateness of the programs and services received
- Justification for individualized career services and training services
- Orientation to services –Missouri Job Center and WIOA programs
- Signed acknowledgement from each participant that he/she is aware of his/her rights and benefits, including the equal opportunity grievance/complaint procedure
- Method of assessment
- Employment planning
- Accuracy of Electronic case management system data entry and posting of outcomes, including the attainment of a degree or certificate and any supplemental employment data
- Program Services - On-the-Job Training (OJT), Classroom Training, Work Experience/Internship, Supportive Services/Needs-related payments, any other service that results in a direct payment being made to, or on behalf of a participant

Additional youth monitoring review items:

- New WIOA eligibility criteria and barrier documentation
- Current Out of School Youth percentage expenditure rate requirement
- Work based learning with educational component twenty percent (20) expenditure requirement
- In School Youth limit five (5) percent enrolled with “requires additional assistance” barrier
- Over Income exception limit five (5) percent

The Jefferson/Franklin WDB JobStat Representatives will conduct quarterly Data Element Validation (DEV) reviews to ensure the integrity of performance outcomes. The DEV will be performed as outlined in OWD Issuance 07-2020. This review is to verify that the performance data elements reported by Missouri are valid, accurate, reliable, and comparable across programs. The review is to identify anomalies in the data, to resolve issues that may cause inaccurate reporting, and to improve program performance accountability through the results of data validation efforts. Monitors will use random-sampling techniques when selecting the active and exited files from the quarter that just ended to review.

Random Sampling

Random sampling techniques shall be used in participant file reviews to test compliance in every subcontractor and funding stream that is contracted with OWD. Each Program Year, the WDB monitors a valid sampling of WIOA Adult and Dislocated Worker participant records combines, by the following services : Apprenticeship, Classroom training, On-the-job training, work experience/internship, supportive services/needs related payments and any other services that result in a direct payment being made to or on behalf, of a participant. The following sample sizes, at a minimum, shall be used depending on the universe to be reviewed:

<u>Universe</u>	<u>Sample Size</u>
1 – 200	69
201 – 300	78
301 – 400	84
401 – 500	87
501 – 1,000	96
1,001 – 2,000	100
2,001 – 10,000	105

Desk Reviews

A desk review shall take place before monitoring a particular operation or system. During the desk review, contracts, correspondence, previous monitoring reports, participant folders, electronic case management system data, and other relevant information shall be evaluated.

On-Site Reviews

After the desk review has been completed, appointments and schedules for actual field visits shall be compiled. Appropriate contact persons shall be notified as to the purpose of the visit and for the arranging of on-site interviews.

Interviews shall be made with customers, employers, trainers, job center staff and includes on-site visits to subsidized employer worksites. Documented interviewing for compliance and program quality shall be performed on all program areas reviewed.

Interview answers shall be recorded as specifically as possible on the monitoring form. These monitoring questionnaires will be used as back-up documents for the final monitoring report.

Corrective Action

Specific corrective action steps shall be recommended based on any deficiencies found and clearly identified. Continuous improvement of service delivery and/or program quality may include recommending training and/or technical assistance or simply to specify the need to conform to written regulations or procedures.

Sub Recipient Financial Monitoring Procedures

1. Financial monitoring review of subrecipients will be conducted annually to ensure fiscal integrity, the adequacy of internal controls and the reliability of the

subrecipient's financial management system as they relate to the administrative subaward. The financial monitoring review includes the following areas at a minimum:

- a. Review of accounts receivable and accounts payable processes
- b. Cost allocation processes/Indirect Costs
- c. Internal controls
- d. Procurement processes
- e. Audit Resolution/Management Decision
- f. Employee bonding
- g. EEO compliance
- h. Contract compliance
- i. Financial Reporting
- j. Source Documentation
- k. Cash Management
- l. One-Stop Operator adherence to RFP/Contract

Additional reviews may be required based on evaluations of risk of Noncompliance.

2. A written financial monitoring report will be issued within 30 days of the conclusion of the field work and exit conference. Any identified areas of noncompliance and recommendations for corrections will be provided to the Board with a written report. All written financial compliance monitoring reports are reviewed and approved by the One Stop Coordinator prior to issuance of the report. The report shall include a request for a Corrective Action Plan by the Subcontracting Agency for any deficiencies noted, and/or comments for improvement to the system. A detailed Corrective Action Plan response, if required in the report, must be submitted by the Subcontracting Agency within a period of no more than thirty (30) days. A written response will be prepared by the Fiscal Manager and/or One Stop Coordinator within a thirty (30) day period of the Submission of the Corrective Action Plan. Additional written responses may be required of the Subcontracting Agency until final approval can be given.
3. As appropriate, the region shall implement additional financial and programmatic monitoring procedures for stand-alone summer youth programs or other special initiatives. These policies will ensure the intended funds are administered in accordance with contractual scopes of work. These monitoring procedures shall be in addition to the regularly scheduled monitoring schedule and occur during program operation to assure accountability and transparency of expenditures. The monitoring process shall include, but not limited to, payroll/timesheet review, as well as worksite, participant and supervisor reviews.