

I. MONITORING PLAN, POLICY AND PROCEDURES

The purpose of this guide is to ensure that there is an adequate monitoring system in place for all WIOA funded activities throughout SMTLWB and to ensure adequate compliance, performance, and management of program activities.

The Program Monitor under the direction of the Executive Director will have the responsibility of coordinating the monitoring process. This will be accomplished through developing and revising monitoring guides and instruments, maintaining contact with state monitoring personnel, reviewing state and federal monitoring policies and procedures, conducting monitoring visits, conducting follow-up visits due to non-compliance with WIOA regulations, and providing technical assistance regarding WIOA regulations and SMTLWB policies.

The scope of monitoring will include procurement, fiscal, program objectives, labor standards, grievance procedures, record keeping, Equal Employment Opportunity provisions, and Americans with Disabilities Act provisions. In order to accomplish this wide-range task, monitoring will include interviews of participants and/or program staff, visits to training sites, an examination of participant files, and a comparison of planned goals versus actual results.

Types of monitoring which will comprise the overall system include the on-site monitoring review and the desktop review. An on-site monitoring visit will be conducted of all WIOA contractors by the Program Monitor. The visit will be announced in advance by way of letter to the contractor and/or WIOA staff. Any areas of concern will be discussed in an exit conference with the contractor and/or WIOA staff prior to the written report. A written monitoring report will be provided to the contractor and/or WIOA staff upon completion of the on-site review. The monitoring report will contain no surprises and, where appropriate, will state that all program areas were found to be in compliance with the contract, state, and federal regulations of WIOA. Areas where technical assistance is provided will be explained in the results section of the report. A written response will be required within 30 days when areas of non-compliance are noted. In order to ensure that corrective action has been completed, a follow-up visit may be conducted when needed.

The desktop review may take place anytime during or after the term of the contract. At this time, any type of activity may be reviewed (i.e., financial, programmatic, contract compliance, etc.). Any areas of non-compliance will be disclosed in the form of a written report. If the contractor and/or WIOA staff is found to be in compliance with the areas of review, a memo will document the visit.

While the Program Monitor will have the ultimate responsibility of monitoring, other WIOA staff will contribute to the overall mission. These staff members include the Executive Director, Special Projects Coordinator, and Fiscal Coordinator. Their function will be to provide technical assistance to contractors and/or WIOA staff who are experiencing problems and to assist the Program Monitor as needed in meeting the terms of the monitoring schedule.

There are different types of services currently offered in SMTLWB, each of which will require a specific monitoring process.

A. Registration/Program Files

Program monitoring for participant eligibility and verification will consist of a minimum of one on-site monitoring visit during the program year. During the visit, participant eligibility will be reviewed with respect to age, income, residence, U.S. citizenship, and selective service registration requirements. Verification (required for a minimum of 10% of applicants registered) will also be reviewed.

B. Training Services

1) Individual Training Accounts/Eligible Training Providers

Program monitoring of training will consist of an on-site monitoring visit to be conducted at least once during the program year. Interviews with participants may be conducted regarding instructor-student relationships, as well as adequacy of curriculum guides, supplies, equipment, and the overall quality of the program. In addition, participants may be interviewed to verify receipt of an orientation to include grievance procedures, EEO assurances, and a description of the training program.

2) On-the-Job Training (OJT)

The monitor will review each On-The-Job Training (OJT) contract on site at least once during the active contract period. Desktop review can be conducted periodically. The SMTLWB OJT Monitoring Report will be completed during the life of the contract. The employer's file should include the following for monitoring purposes: Copy of contract, 1-9, invoices/progress reports, time and attendance records, payroll records, application, master addendum and EEOC rights.

C. Contracted Youth Services

One on-site monitoring visit will be made of each site. A memo will be emailed to the contractor and/or WIOA program staff noting any area of non-compliance at the site. The participant/student and supervisor/instructor interview may be conducted to ensure program success. A final comprehensive monitoring report will be emailed to the contractor and/or WIOA program staff upon completion of the reviewing all work site and classroom settings.

D. Support Services

The support services program will be reviewed at least once during the program year. The primary focus of the review will be to ensure that services are provided in accordance with the current policy. Interviews may be conducted with participants to ensure that they are receiving the service that they are eligible for and have requested to receive.

II. LOCAL WORKFORCE DEVELOPMENT BOARD OVERSIGHT RESPONSIBILITY

A. Monitor

Monitoring results will be made available to the LWDB on a regular basis. This will be accomplished by a verbal and/or written monitoring update presented during the LWDB meetings. The LWDB will review the monitoring reports of existing programs and make recommendations regarding continuation or renewal of such programs.

B. Evaluate

As management tools and monitoring reports will affect planning, procurement, and performance, the evaluation of monitoring reports could lead to continuation or termination of programs and/or contractors.

C. Appeal Process

The appeal process for subcontractors who disagree with monitoring findings is to put their request to appeal in writing to the SMTLWB Executive Director. The SMTLWB Board Administrative Committee will set up a hearing for the appeal and make the final decision. The Administrative Committee's decision will be final.

D. Procurement and Financial Monitoring

Procurement standards used by SMTLWB are contained in the Grant Management and Sub-recipient Monitoring Policy (Policy Number 2013-007), published by the Central Procurement Office.

III. PROCEDURES

A. AJC & Affiliate WIOA Offices - Participant Files

- Contact Career Specialist with a request to review a random list of participant files pulled from their case load.
- Files are delivered to Main Office.
- Files are checked for copies of VOS forms (application/eligibility, registration, and exit forms), verification of age, verification of layoff of dislocated workers, documentation of activities provided (core, intensive, and training), documentation of training activities (vouchers, ITAs, financial aid coordination forms), signed orientation forms, and non-discrimination forms.
- Files are checked for thorough IEPs (Individual Employment Plan), listing their educational history, work history, employment barriers, services needed to overcome barriers, core and intensive services provided, and training plan, which should include rationale for training.

- VOS is used to verify that dates and other documentation in participant files are reflected accurately. This includes case notes, documents describing activities, and registration/updated registration forms.
- Files are checked for documentation of monthly contact (case notes) with individuals while they are active. Once they have been exited from the program, there should be quarterly follow-ups documented.

B. On-The-Job Training

- Contact company representative to schedule a visit and provide them a random list of participant files for review at that time.
- Verify that Employer's files include a copy of the OJT Master Agreement (verifying dates of contract), the individual's employment applications, the Employer Assessments, the Master Addendums, the OJT Training Plan, EEOC Rights, Non-Discrimination sheets, 1-9 information sheets, Invoices (verifying that no more than 50% of hourly wage is reimbursed for the approved training hours), and Time Card/Payroll Records.
- Verification is made of starting hourly wage and the training hours worked as well as the job title for each participant.
- A copy of the current Worker's Comp Policy must be on file with Workforce Solutions along with the original OJT Master Agreement, the Employer Assessments, the Master Addendums, the OJT Training Plan, EEOC Rights, Non-Discrimination sheets, 1-9 information sheets, OJT Information Worksheet and Invoices.

C. Training Providers

- Contact training provider to schedule a visit and provide them a random list of participating student's files for review at that time.
- Verify Individual Training Account (ITA) Agreements issued by WIOA career specialist for students enrolled with the training provider. Review ITA expenses for each trimester enrolled. Maximum ITA per individual is \$5000.

- Financial aid coordination worksheets are reviewed for each WIOA student.
- Review Attendance records of WIOA students; in addition, a comparison is made between the attendance records and dates on the support service travel reimbursement forms.

D. Youth Subcontractors

- Contact youth subcontractor to schedule a visit and provide them with two months of the Fiscal' Year to review at that time.
- A random list of participant students is provided to the youth subcontractor upon arrival for review.
- Each file is reviewed for VOS forms (Application, Eligibility, Registration, and Exit), documentation of age and income, Individual Employment Plan (IEP), Participant Orientation Form, Release of Information, Non-Discrimination Provision Form, Grievance Procedure, and Work Readiness Attainment Checklist (if applicable).
- A Fiscal Review is completed at the visit.
- Monthly counseling notes are reviewed.

E. Incumbent Worker

- A Desktop review is done upon completion of the Incumbent Worker training to verify the type of training provided and the list of participants.
- Employer contribution (Instructor's Salaries, trainee's wages during training, curriculum development, materials and supplies, use of space and equipment during training project, and/or tuition expense) will be provided and reviewed for a 50% Employer Match of the cost of the Incumbent Worker training assistance request.

A Monitoring Review report is produced from the information gathered for each Monitoring visit. If there is a fiscal finding, it will be noted in the report and immediate steps are taken to reconcile depending on the situation. If there is documentation missing,

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An example of a fiscal finding: During a monitor visit review, attendance records are reviewed. In comparing them to the Request for Travel Reimbursement submitted by the student, it is discovered that the student was actually not in attendance the day he requested payment. Therefore, there was an overpayment. The next Request for Travel Reimbursement would have the overpayment deducted. The finding would be noted in the Monitoring Review report along with the steps to be taken for reconciliation.

Title: SMTLWB Policy

Effective Date: January 31st, 2019

Duration: Indefinite

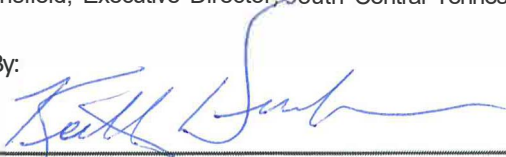
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Date

Approved By:



12/21/2018

Keith Durham, Board Chair, Southern Middle Tennessee Local Workforce Board

Date