

**SOUTHWEST CORNER WORKFORCE DEVELOPMENT BOARD  
PROGRAM MONITORING & OVERSIGHT PROCEDURES MANUAL**

## INTRODUCTION

This manual outlines the oversight and monitoring procedures used to insure that Service Providers, Sub-Recipients, and PA CareerLink® sites of the Southwest Corner Workforce Development Board (SCWDB) are providing services that are in compliance with the Workforce Innovation and Opportunity Act of 2014 (WIOA).

A Risk Assessment will be done to determine High or Low risk. Low risk sites will be monitored at least every other year. Single Audits from Sub-Recipients will be reviewed each year. PA CareerLink® sites will be monitored once each year. This method will also help to identify those Service Providers in need of technical assistance. Forms to be used will be attachments to this policy.

### I. SCHEDULE OF SITE VISIT

Service Providers, Sub-Recipients, and PA CareerLink® site contact person will be notified to schedule an appointment to review the following areas as applicable:

- a. Verify Agreements/Contracts/ITAs are on file, signed, and dated.
- b. Participant records for eligibility, attendance, and/or payroll.
- c. Equal Opportunity personnel and/or materials.
- d. Americans with Disabilities requirements.
- e. Fiscal Records to include account cards, financial aid records, pay records, deposit slips, etc.
- f. Interview participants.

### II. DESK REVIEW

A review of agreements, contracts, fiscal records, and reports submitted to fiscal agent will be conducted for Service Providers, Sub-Recipients, and On-the-Job Training sites prior to the onsite visit. A Risk Assessment will also be completed prior to the visit.

### III. ONSITE REVIEW

Upon arrival at the site to be monitored, review monitoring questionnaire (if already answered), and check ADA compliance. Items to be monitored include:

#### Systems Review Questionnaires

- a. Provision of Core Services
- b. Provision of Intensive Services
- c. Training Services
- d. Supportive Services
- e. On-the-Job Training
- f. Youth Activities
- g. Equal Opportunity/Affirmative Action/Grievance Procedures
- h. ADA compliance
- i. Customer Satisfaction

#### IV. SYSTEMS REVIEW

The Oversight Coordinator/Monitor will utilize the Monitoring Tool and Questionnaires as applicable to review each program. Tool will note:

- a. Specific program
- b. Contract or Agreement
- c. Equal Opportunities
- d. ADA compliance
- e. Prevention of Fraud and Abuse

#### V. PARTICIPANT INTERVIEWS

Participant Interviews will be conducted individually and privately, away from site staff or service provider. If the participant is not present during the site review, a questionnaire can be left at the site or sent to the participant for completion. Participants may also be interviewed by telephone.

Questionnaires used for this purpose will address services received or receiving through WIOA/SCWDB programs, services and activities

#### VI. FISCAL REVIEWS

Fiscal Review Questionnaires will be completed as appropriate for the system(s) being monitored. These questionnaires will include:

- a. ITAs (on the PA Eligible Training Provider list)
- b. Service Providers
- c. Contractors
- d. On-the-Job Training (State and Local requirements)
- e. Attendance/Payroll Verification
- f. Summary of Questioned Costs Form

#### VII. MISCELLANEOUS

- a. A Fiscal Report will be completed prior to the site visit for each title/contract. Source for the report include invoices from the site or service provider submitted to the Fiscal Agent. The Oversight Coordinator would use this data to verify all costs while on the site. Review will include a minimum of one month of expenditures.
- b. In addition to the questionnaires the Oversight Coordinator will review a random sampling of participant records and any other documents dealing with the contract.
- c. Prior to the exit conference, all data from questionnaires and records are evaluated. If necessary, clarification from the site representative will be requested.
- d. Oversight coordinator will identify and recommend corrective action on any deficiencies and/or areas of concern noted during the review. These actions will be included on the Exit Conference Worksheet.
- e. If there is evidence or information, which suggests possible fraud or abuse, the data in question will be reevaluated for complete understanding. If it still appears to be fraud or abuse, it must be documented and reported in accordance with current SCWDB Policies and Procedures.

#### VIII. EXIT CONFERENCE

An Exit Conference will be held in person or by telephone with the site representative after all interviews and reviews are completed. The following items will be discussed in the conference:

- a. All findings and areas of concern.
- b. Sub-recipient responses will be noted.
- c. Attendance/Payroll verification discrepancies.
- d. Recommended corrective action(s).
- e. Monitored Site will be informed of the 30-day working day response deadline.

#### IX. PREPARATION OF THE OVERSIGHT/MONITORING REPORT

The following steps will be performed by the Oversight Monitor to complete the site report. These reports will be used to report activities to the SCWDB.

- a. Review and complete all forms.
- b. Compile report utilizing the following format:
  - 1. Staff Response Form
  - 2. Oversight/Monitor Report
  - 3. Scope of Review
  - 4. Program Review
    - i. Program Review Questionnaire
    - ii. Participant Interviews
  - 5. Fiscal Review
    - i. Fiscal Questionnaire
    - ii. Oversight/Monitor Fiscal Report
    - iii. Summary of Questioned Costs (if any)
    - iv. Attendance/Payroll Verification
- c. Desk Review
- d. Findings and Recommendations, as applicable
- e. Any Attachments
- f. Exit Conference Documentation

#### X. REPORTS TO SCWDB

All site monitoring reports completed during the quarter will be submitted to the SCWDB at the quarterly board meeting.

#### XI. STAFF RESPONSE

- a. This form is to ensure that the President, SCWDB, and CLEOs are aware of any problems at a particular site and that they are in agreement with the Oversight Coordinator/Monitor's Report.
- b. The Report will first go to the President, CLEO, SCWDB committee and SCWDB, and finally to the reviewed site. In the event there is a finding, the site representative will also be notified to assist in corrective action.
- c. If the President is in agreement with the report, it is signed, dated, and returned to the Oversight Coordinator.
- d. If President disagrees with the report, they must state their reason on the form and return it to the Oversight Coordinator for re-evaluation. If the Oversight Coordinator still determines that it is a finding, it will be resubmitted to the President for a final determination.
- e. The completed Report will be signed by the President and sent to the monitored Site, within thirty (30) working days.

## XII. SUBMISSION OF THE REPORT

The following will be sent to the monitored site:

- a. Oversight Coordinator/Monitor Report
- b. Summary of Questioned Costs, if any
- c. Findings and Recommendations, as applicable

## XIII. SITE RESPONSE

If there is a finding, the Site must respond, in writing, to SCWDB within thirty (30) working days as to any corrective action taken or planned. If no response is received, the President will contact the site representative by telephone, followed by written notice about their response. If still, no response is received within fifteen (15) days, the President will determine whether the site will be given additional time to respond or to begin termination proceedings or any other appropriate action against the site.

## XIV. FINAL DETERMINATION

If the site is in agreement with any finding(s) and takes the recommended corrective action, no Final Determination is necessary. The Oversight Coordinator will conduct a follow-up review.

If the site is not in agreement with the report, the Oversight Coordinator will re-examine the findings. If necessary, another visit will be conducted to examine the data relating to the finding(s). The Oversight Coordinator will issue another report stating whether the finding is still valid or not.

- a. If invalid, the site will be informed in writing that the finding is invalid and no response is necessary.
- b. If valid, the site will be informed that it must comply or the President of WGCJTA, Inc. will take further action.

## XV. FOLLOW-UP REVIEW

Within ninety (90) days of the site response approval, the Oversight Coordinator will conduct a follow-up visit to ensure that the corrective action was taken. The Follow-Up Review Form will be utilized.

- a. If the finding is due to a reporting requirement, a follow-up can be conducted in-house and the site will be informed in writing of the outcome.
- b. For all other findings, an onsite follow-up will be conducted. The Follow-Up Report will be completed and submitted for approval, utilizing the Staff Response Form. When the Report is approved, the Site will be sent a Follow-Up Review Report.
- c. If the Site is still deficient, the President will determine what action is to be taken. If corrective action has been taken on all deficiencies and the Follow-Up Review has been completed, the monitoring process is complete.

## XVI. OJT CONTRACT REVIEW

- a. An onsite visit will be conducted to verify contracts and requirements are being followed.
- b. Participant Interview(s) will be conducted.
- c. Payroll Verification will be matched to invoices.
- d. Job Description and Training Outline will be verified.
- e. Site Satisfaction Interview will be completed.

## XVII. YOUTH PROGRAMS

In-School, Out-of-School, and Year-Round Youth Programs will be monitored using Youth Training Program Procedures. The same processes used to monitor other WIOA funded programs will be followed.