

NEMO Workforce Development Board
WIOA Title I-B
Sub-State Monitoring Plan

PRE-MONITORING ACTIVITIES

Monitoring Scheduling

All subcontractors shall be monitored by staff of the NEMO Workforce Development Board for each program they operate, at least annually. The Monitoring schedule and sample size will be in accordance with DWD Issuance 15-2017 Sub-State Monitoring policy. The Subcontractor shall be notified of the intended dates of scheduled monitoring at least two weeks prior to the date of the visit whenever possible. The NEMO WDB reserves the right to conduct unscheduled monitoring in conjunction with or in response to investigations of misfeasance and/or malfeasance or previous monitoring findings.

Programmatic and Operational Monitoring will be conducted that effectively measures compliance with WIOA regulations and DWD Policies. Monitoring will include a comprehensive examination of compliance issues cited in prior State and Region reviews and the determination where corrective measures were taken to address and resolve those issues.

- **Responsible Representative** – Under WIOA the Local WDB must identify who will perform the oversight functions. A staff member that has significant knowledge of programs, scopes, and laws and demonstrates an absence of conflict-of-interest must perform this oversight function. The Operations/Program Coordinator will oversee the monitoring activity with assistance from other office staff as needed.
- **Accountability** – The Operations/Program Coordinator will submit the monitoring report to the Executive Director who will then share the report with the One-Stop Committee for review. This report must be submitted annually.
- **Compliance and Performance** – DWD will perform an annual monitoring regarding compliance with the terms and conditions of each contractual scope of work. They will also cover the adequacy of assessment, planning of activities and services, coordination with One-Stop Delivery System partners to meet the comprehensive needs of customers and customer's outcomes. All problems must be resolved by prompt and appropriate corrective action.
- **Compatibility** – Local policies must demonstrate their programmatic and operational oversight systems effectively measure compliance compatible with WIOA regulations and DWD policies.
- **Quality Assurance** – Local board must create a continuous improvement plan for any issues cited in a review
- **Additional Monitoring Required** - .Additional financial and programmatic monitoring must be performed on all stand-alone youth programs or other special initiatives. This monitoring will be administered in accordance with the contractual scopes of work. These policies are to supplement existing monitoring duties and must be conducted during program operation to assure accountability and transparency of expenditures.
- **Methodology and Target Universes** - A random sampling of files from **every funding stream** will be selected to test eligibility. This will include all WIOA and stand-alone programs. WIOA Adult and Dislocated Worker records/enrollments will be combined for the purpose of sampling NGCC service delivery. A combined sampling of records/files of Adult and Dislocated Workers participants enrolled in any of the following services:
 - Classroom Training
 - On-the-Job Training
 - Work Experience/Internship/Apprenticeship
 - Support Services/Needs-related payments
 - Any other service that results in direct payment being made to, or on behalf of, a participant

SAMPLE SIZE

The following sample sizes are required, at a minimum, depending on the universe to be reviewed. *This table is for a random sampling with a confidence level of 90 percent and a margin of error of 8 percent.*

Universal Sampling Size		
From	To	# of Files to review
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

Pre-Monitoring Desk Top Review

Prior to the beginning of the monitoring visit, monitoring staff may review records by desktop. A random sampling of items may be reviewed during the monitoring. Those items will include but not be limited to:

1. subcontractors contract scope of work;
2. subcontractors planned performance levels (as applicable);
3. case management system information relating actual performance;
4. contract progress reports to determine actual expenditures;
5. State Case Management System record data

ON-SITE ACTIVITIES**Entrance Conference**

Upon arrival at the subcontractor's primary office, the lead person of the monitoring team shall hold an Entrance Conference with the WIOA Title I-B Operator and/or Designated One-Stop Operator of the Job Center being monitored or his/her representative. The lead monitor shall outline the monitoring activities to be conducted and the WDB personnel will be responsible for each activity. Monitors will answer any questions that the subcontractor and/or one-stop operator staff may have relating to the monitoring.

One-Stop Operator Staff Interview

The NEMO Workforce Development Board has designated the Functional Leaders as the One-Stop Operator. As the One-Stop Operator, the Functional Leaders shall be interviewed at least once during each program year. A standardized form will be used so that Functional Leaders can conduct a Job Center self-evaluation. The questionnaire is designed to allow Functional Leaders to create and evaluate progress with NGCC process and procedures, evaluate minimum standards and the effectiveness of the processes. The WDB will use their responses to identify skills/service gaps and to create a continuous improvement plan.

Monitoring process will include questionnaires and procedures for interviewing customers, employers, trainers and Job Center staff. However, at a minimum, the interview will inquire about the following processes and systems:

1. General management of the job center; including facility and maintenance responsibilities
2. Coordination of services

3. Continuous improvement
4. LMI system and data
5. Availability of resources
6. Performance and outcome measures, including customer satisfaction
7. Record keeping and reporting, including participant tracking
8. Appropriateness of Adults and Dislocated Workers in need of Individualized Career and Training Services
9. Next Generation (NGCC) services and model system
10. Orientation to services to include participant rights under complaint and grievance procedures
11. Implementation of NGCC minimum standards
12. NGCC Membership/Assessment
13. Labor Exchange
14. NGCC Products and Service Usage to include workshops
 - WIOA Adult and Dislocated Worker
 - Classroom training
 - On the Job Training
 - Short Term pre-vocational services
 - Support Services
15. WIOA Youth
16. EO Observation

Personnel Systems

The NEMO Workforce Development Board monitoring staff may review one or more personnel records of individuals paid through contracts with the NEMO WDB. The purpose of this review shall be to ascertain if subcontractor staff:

1. Possess the education and experience noted in proposals submitted to the WDB;
2. Expend the time on contract related activities charged against the contracts being monitored;
3. Have documentation of capacity building efforts on their behalf; and
4. Have signed complaint and grievance procedures on file.

Confidential information, such as disciplinary action and service reports are not considered relevant to normal monitoring and should be stored in a closed envelope within the personnel file.

EEO and ADA Compliance

NEMO WDB monitoring staff shall survey the subcontractor's hiring practices, promotion practices, facilities, and outreach and intake procedures to ascertain the subcontractor's compliance with the Equal Employment Opportunities and the Americans with Disabilities Acts.

Participant File Review

At a minimum, participant records are to be reviewed for the following:

- Documentation of participant eligibility and/or priority for the program and services received
- Orientation to services
- Orientation and signed acknowledgement of the participant to his/her rights under complaint and grievance procedures
- Justification for the provision of Individualized Career Services or Training services
- Method of assessment
- Employment planning
- Individual Training Accounts
- Appropriateness and accuracy of participant payments (support service and needs related)
- Appropriate date entry and posting of outcomes, including attainment of a degree or certificate and any supplemental employment data

Must adhere to WIOA Youth requirements:

- Out-of-School Youth 75% expenditure requirement
- 20% work-based learning with educational component requirement
- 5% limit on In-School Youth enrolled with the “Requires additional assistance” barrier
- 5% over-income exception limit, and
- New eligibility criteria and barriers

Subsidized Worksite-Training Site Reviews

During each monitoring visit, a representative sampling of active or recently active work and/or training sites will be visited. The sampling shall, whenever possible, represent all of the activities in which participants have been served. Employers, supervisors and/or instructors will be interviewed using the appropriate form. The monitor will also use these forms to review health and safety standards at the work/training site and to make such other comments as may be relevant to the site review.

Exit Conference

Upon completion of the on-site monitoring activities, the lead monitor and/or monitoring team will conduct an Exit Conference for the WIOA Title I-B Operator and/or Designated One-Stop Operator of the Job Center being monitored or his/her representative. At the discretion of the lead monitor, information, which may identify specific individuals who have been interviewed and who have made accusations of mismanagement, misfeasance or malfeasance, may be withheld pending an in-depth investigation of the accusations.

The Exit Conference shall inform the agency of the areas which were covered during the monitoring, monitoring findings and (if formulated) recommendations relating to the findings. If disallowable costs have been identified, the subcontractor will be made aware of them during the Exit Conference.

POST-MONITORING ACTIVITIES

Monitoring Report

The monitoring team shall produce a written monitoring report for each subcontractor, which will outline at a minimum:

- ◆ the activities which were monitored;
- ◆ the systems which were monitored;
- ◆ individual participant files which were found to contain errors;
- ◆ monitoring findings; and
- ◆ recommended corrective action
- ◆ regional and subcontractor performance
- ◆ contract concerns
- ◆ best practices
- ◆ recommendations

As this report will be considered a public document, names of participants will not appear in the report. The monitoring report shall be reviewed and approved by the Executive Director of the NEMO Workforce Development Board. The Executive Director will prepare a cover letter to the subcontractor, which will indicate whether or not the subcontractor is to respond to the monitoring report. Any findings will result in required corrective action plans submitted to the Administrative Entity within 30 days after the subcontractor receives the written monitoring report. If the subcontractor's responses are unacceptable,

the WDB will respond within 30 days. The subcontractor will have 10 days to respond to this second request. Monitoring reports will be provided to the WDB and CLEOS on an annual basis.

One-Stop Committee Action

The One-Stop Committee will review the monitoring report, the subcontractor's response and may:

- Accept the subcontractor's response
- Reject all or part of the response and/or require resubmission of the response
- Require additional corrective action, or
- Recommend the institution of sanctions against the subcontractor to the NEMO WDB.

When, in the opinion of the One-Stop Committee, all the monitoring findings are satisfied, the Committee shall request that a summary of the monitoring report be prepared by the NEMO WDB staff for presentation to the NEMO WDB. A recommendation that further monitoring activities be suspended for the program year in question, pending receipt of any additional information which might call for reactivation of monitoring, will also be submitted to the WDB.

NEMO WDB Action

The NEMO WDB may accept or reject the summary monitoring report, or may request additional information regarding all or part of the report. When the NEMO WDB is satisfied that the process has been satisfactorily completed, they will either accept the original, amended or substitute summary report, and move suspension of monitoring.

If the One-Stop Committee recommends sanction to the NEMO WDB, the WDB shall take up the recommendation at the next scheduled WDB meeting or the Chairperson may call a special meeting of the WDB to consider the recommendation.

One-Stop Committee Action

The One-Stop Committee shall also receive a summary of the final monitoring reports. The Committee may want to consider this information when reviewing eligibility for and recommending the selection of Title I subcontractors, One-Stop Operators and operators of other programs assigned to the Board, with the full WDB and CLEO's.

Financial Procedures Review

At least once during each program year, the WDB financial monitoring staff shall review each program operator's financial procedures and systems to ensure fiscal integrity and compliance with WIOA section 184(a)(4) [29 U.S.C. 3244(a)(4)], annual DWD agreements, and 2 CFR Part 200 and Part 2900. In addition, funds intended to support adult, dislocated worker, youth, Next Generation Career Centers (NGCC), stand-alone summer youth programs or any other special initiatives will be monitored in accordance with contractual scopes of work. The monitoring shall be completed using a standardized monitoring instrument, which may be customized to meet special contract provisions of individual subcontractors. This review shall include a sampling, covering at least one-month's activities, and shall consist of the following procedures:

1. tracing reports to books (contract progress reports to original books);
2. a computation of excess cash and review cash for interest earned on advances;
3. a review of trial balances and bank reconciliations;
4. an examination to assure that FDIC coverage and collateral security are adequate for cash on hand;
5. an examination of inventory records;
6. a review of bonding policy;
7. a check on internal controls and separation of duties;

8. audit resolution/management decision
9. an examination to determine if program income exists, is being accounted for and reported in accordance with applicable requirements;
10. a review and interview to ensure that staff is following the proper guide for determining costs applicable to WIOA (OMB Circular) and WIOA procurement guidelines;
11. a review of the cost allocation system;
12. a regular examination of expenditures to test transactions against cost categories, cost limitations, and;
13. a review and certification the procurement process is in compliance with the WIOA procurement system guidelines;
14. a determination if stand-in costs exist and are being accounted for; and
15. a review of records to ensure proper source documents exist.

The monitoring will result in a written monitoring report, subject to review and approval by higher authority, other than the monitor. Any findings will result in required corrective action plans submitted to the Administrative Entity within 30 days after the program operator receives the written monitoring report, and correction satisfactorily implemented within one year of the finding. Subsequent monitoring will review prior financial monitor reports and investigate any prior findings and their resolution.