Monitoring Review Guide
Local Workforce Area 8

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| **PLANNING** |

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| **Step 1: Pre On-Site Planning** |

The following activities should be conducted prior to the on-site annual review:

1. Sub-recipient Notification – The sub-recipient should be notified in writing of the local monitor’s plan to conduct a review. \*Note: Use **Attachment A** as a standard guide to send to the sub-recipient.
2. Scheduling:
	1. Arrange a time to conduct the entrance conference
	2. Identify documents needed for on-site and desk review. Refer to the Document Request Listing sent to the sub-recipient
	3. Send the Desk Review Questionnaires (Programmatic/Administrative/Financial, for example) for the sub-recipients to fill out/update. Assure that appropriate staff will be available for the on-site visit
	4. Schedule the exit conference

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| **DESK REVIEW** |

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| **Step 2: Follow-up** |

 **Purpose:** To review any outstanding issues from the previous year’s local monitoring review.

1. Review the most recent annual local and state monitoring reports and ensure that the corrective action plan has been properly addressed by sub-recipients. Consider any items that require follow-up.
2. Evaluate whether the sub-recipient has taken appropriate corrective action to address findings and recommendations.

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| **Step 3: Program Overview** |

1. Review the completed questionnaire for reasonableness and adjust areas of concern based on results to gain an understanding of the general processes and overview of sub-recipient operations.

**Step 4: Policies and Procedures Review**

1. Obtain the sub-recipient’s policies and procedures (Program and Fiscal) and review the procedures to gain an understanding and use when completing the review.
2. Ensure the area has all the required written policies. *Consider recommending additional policies for the subrecipient to adopt if there is a need or benefit.*

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| **Step 5: Contract Management Review** |

**Purpose:** To review requirements and expectationsas outlined in contracts.

Documentation Used:

* Listing of service provider contracts administered by the subrecipient
* Approved contract negotiations

 Review Process:

1. Obtain a listing of all service provider contracts and modifications; determine if there are any new contracts or modifications for the PY. Note: If there are no new contracts or modifications then review extensions of the contract indicating the amount of WIA funds granted and for the current program year.
2. Review sub-recipient contract management process for tracking budget to actual expenditures per service provider contracts to ensure reasonableness of process and tracking.

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| **Step 6: On-Site Document Preparation**  |

1. Compile the following documents/reports to be used for the on-site review prior to the visit:
	1. Select a list of participant’s for the eligibility review in Step 8 (send sample to the service provider with a short window to retrieve the files prior to the visit or pull participant files at random on-site).

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| **ON-SITE REVIEW** |

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| **Step 7: EO and ADA Accessibility Review** |

**Purpose:** To review sub-recipients for compliance to Equal Opportunity and Non-discrimination requirements of WIA.Note: EO and Non-discrimination and Grievance policies are reviewed in Step 4. Participant files are reviewed for EO compliance in Step 8.

Documentation Requests:

* Obtain sample pamphlets, advertisements for staff recruitment, brochures and/or other documents used to promote WIA services and programs.

Review Process:

1. Visual inspection of One-Stops to ensure that WIA “Equal Opportunity is the Law” posters are centrally located and in plain sight of both customers and staff and displayed in English and Spanish.
2. Visual inspection of One-Stops to ensure that contact information for the local area EO officer (and/or state EO officer) and for the Civil Rights Center are centrally located and in plain sight of both customers and staff.
3. Visual inspection of One-Stop for TTY and other accessible devices.
4. Review pamphlets, brochures, advertisements for staff and/or other documents used to promote WIA services and programs to ensure that the appropriate EO tagline is visible.

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| **Step 8: Participant File Review** |

 **Purpose:** Toreview Youth, Adult, and Dislocated Worker participant files for WIA, state and local policy compliance.

Documentation Requests:

* Participant files for selected sample

Review Process:

1. Obtain a listing of all Youth, Adult, and Dislocated Worker participants for the PY from the Total Participants Report on VaWC.
2. Select a sample of 10% of the participants from each funding stream (Youth, Adult, and DW). Consider the following when selecting participant files and document sample determination:
	* New Service Provider
	* On-going issues?
	* Service Providers not reviewed in previous state monitoring visits
	* Previous local monitoring reports
	* Number of case managers
3. Complete the “Local Monitor [Participant File Review Tool](file:///%5C%5Cits7001%5CWIAshare%5CMonitoring%5CReview%20Tools%20UPDATED%5CEligibility%20Review%20Tool%20-%20MOVED%20TO%20M.xlsx)”, using the appropriate tab in the document, to determine proper eligibility compliance and proper case management for selected participant files. This tool is not mandatory.
4. Ensure that participant files are maintained in confidential manner (locked up) and that sub-recipient is following Virginia Workforce Letter #11-03, Record Retention.

**Step 9: Expenditure Review**

Purpose: To determine that expenditures have been made against the correct cost categories and within the cost limitations specified in the Act and the regulations.

1. Select a sample of expenditures for the PY (and previous, if applicable) for 1 month using the Expenditure Listing obtained from the sub-recipient. If necessary, use the chart of accounts to determine funding codes for identifying the necessary funding streams from the Expenditure Listing.

Review Sample of Invoices for the following:
*Note: Use the* [*Expenditure Analysis tool*](file:///%5C%5Cits7001%5Cwiashare%5CMonitoring%5CAnnual%20Review%20Tools%5CExpenditure%20Analysis%20Tool.xlsx) *to document attributes below.*

1. Ensure invoice has proper approval
2. Review invoice description to determine if cost is allowable
3. Expense is properly supported by invoice
4. Invoice and Voucher are mathematically correct
5. Expense was charged to appropriate fund code

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| **Step 10: Payroll** |

Documentation Requests:

* Payroll Timesheets for selected sample month
* Expenditure Listing for the selected sample month (obtained in Step 9: Expenditures)

Review Process:

1. Obtain payroll data (timesheets) for a selected month for all sub-recipient employees and review the following: *Note: Use the* [*Expenditure Analysis tool*](file:///%5C%5Cits7001%5CWIAshare%5CMonitoring%5CReview%20Tools%20UPDATED%5CExpenditure%20Analysis%20Tool.xlsx) *to document attributes below.*
2. Signature of recipient is present
3. Proper approval by supervisor
4. Total payroll hours per timesheet agree to payroll expenditure for the time period being reviewed (per expenditure listing)
5. Investigate if excessive regular and overtime hours
6. Scan for unusual deductions or changes to employee hours/regular pay/bonus/incentives
7. Do hours agree to cost allocation

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| **Step 11: Inventory** |

*\* For all purchases of equipment over $5,000 approval by the SCWIB and VCCS system office is required.*

Documentation Requests:

* Current Inventory Listing purchased with WIA funds

Review Process:

1. Obtain the listing of all current inventory purchased with WIA funds.
2. Review purchases over $5,000 and determine if the LWIA needs to obtain proper approval by the VCCS office.

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| WRAP-UP |

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| **Step 12: Sub-recipient Concerns/Technical Assistance Needed** |

**Purpose**: To allow sub-recipient to express concerns for current review or concerns for the entire program as a whole including challenges or obstacles that may arise as well as request any technical assistance that might be needed.

Review Process:

1. If a technical assistance plan is needed; follow up will be done after plan is created, implemented, and completed.

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| **Step 13: Strengths/Good Practices** |

**Purpose**: To highlight practices that result in positive outcomes for clients, staff, or programs.

 Review Process:

1. Discussion of strengths found in review including good practices (examples peer file reviews; using VAWC reports, etc.).

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| **Step 14: Exit Conference (Review of Findings, Concerns and Good Practices)** |

**Purpose:** To wrap up the review and continue to take action on the Corrective Action Plan or show Corrective Action Plan has been satisfied.

 Review Process:

1. Discuss overview of any Findings that are out of compliance and discuss required actions including responses and completing the actions if applicable.
2. Discuss overview of any Concerns that are in the risk area and discuss recommendations to keep them from becoming Findings if applicable.
3. Discuss overview of any Considerations that are in the improvement area to include Good Practices if applicable.
4. Discuss being on track to meet performance outcomes.

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| **Step 15: Report (Draft and Final Versions)** |

**Purpose:** To ensure that the sub-recipient is taking proper actions to complete the Corrective Action Plan if CAP is current as well as moving forward.

 Review Process:

1. Give date for final responses/corrections and Local Monitor will keep track of the dates corrections are completed. CAP will continue until ALL Findings are addressed.

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| ATTACHMENTS |
| **Attachment A:**  |



date

Name of Sub-recipient

Address

Address

Dear Name,

The South Central Workforce Investment Board has scheduled an onsite visit of the Subrecipient during the week of DATE. The local monitoring will be directed toward ensuring compliance with the Workforce Investment Act (WIA), regulations, and state policies, while identifying areas that may need further technical assistance.

Workforce Development Services views the WIA review process as a cooperative effort, which provides an opportunity for the early discovery of deficiencies requiring corrective action. As part of the oversight process, we will have an exit conference to discuss any issues found during the review. I anticipate the exit conference to be on DATE. A draft report will be issued within thirty (30) days of the completion of the review. There will be a ten (10) day response period following the issuance of the draft report for the SUBRECIPIENT to address any discrepancies or concerns related to any findings in the draft report. Once this process is complete, a final report will be issued to the SUBRECIPIENT.

Thank you in advance for your staff’s assistance that will be needed during the week in order to ensure that the review is conducted efficiently and with minimum interference. If you have any questions about this process, please do not hesitate to contact me via phone at 434-542-5871 or via e-mail at dcrowder@pure.net.

Sincerely,

Debra Crowder

Executive Director

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| **ATTACHMENT B** |

*SOUTH CENTRAL WORKFORCE INVESTMENT BOARD*

Local EO Monitoring Checklist

Workforce center/facility:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_ Facility has a person designated (EO liaison) to receive complaints and Provide general EO information. Contact Information: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_ Pamphlets, brochures and other documents used to promote WIA services and programs have EO tagline and TTY # if applicable *(the tagline is…..”Equal opportunity employer/program”. “Auxiliary aids and services are available upon request to individuals with disabilities”.)*

\_\_\_\_\_\_\_ Procedure has been developed to notify staff and participants of LWIA EO and non-discrimination policy and complaint/grievance procedure. Describe Procedure: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_ Procedure has been developed to notify staff and participants of their rights to file a complaint. Describe procedure: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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\_\_\_\_\_\_\_ “EO is the Law” posters are prominently displayed in English, Spanish, and any other language deemed necessary. What other languages are used? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Where are the posters displayed? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_ A procedure or agreement is in place to provide services to Limited English-speaking persons (LEP). What LEP populations do you serve? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Describe how you provide LEP services: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_ The workforce center is physically accessible for persons with disabilities. ADA Accessibility survey: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Items outstanding or impeding accessibility: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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\_\_\_\_\_\_\_\_ The workforce center/facility is programmatically accessible for persons with disabilities (TTY, accessible workstation, devices, etc).

 Describe accessible equipment found in the center: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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\_\_\_\_\_\_\_ Participant records contain race/ethnicity, sex, age, and where known, disability status.

\_\_\_\_\_\_\_ Participant records are maintained in a confidential manner. Describe: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_ Per 29 CFR 37, records are kept for three (3) years on applicants, eligible, participants, terminees, applicants for employment, and employees.

\_\_\_\_\_\_\_ Describe where the records are retained for the three (3) years and the procedure for disposal of records older than 3 years: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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\_\_\_\_\_\_\_ A complaint log is maintained for WIA related complaints? \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Monitor Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Center Staff signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_