



POCONO COUNTIES WORKFORCE DEVELOPMENT BOARD (WDB)/AREA (NE 135)

INTERNAL MONITORING GUIDE/PROCEDURES

1. PURPOSE

The Workforce Innovation and Opportunity Act (WIOA) requires Local Workforce Development Boards (WDBs) to conduct oversight and monitoring of WIOA funded programs and activities. Accordingly, this procedural guide is designed to provide direction to the monitoring staff of the Pocono Counties Workforce Development Area as to the purpose, philosophy and overall objectives of the process of monitoring both the administrative and programmatic aspects of service delivery.

The principle objectives of the monitoring process are to assist the Pocono Counties Workforce Development Area (WDA) in developing quality assurance, technical assistance, oversight and continuous improvement as the central theme in serving the needs of its customers. This document has been created to outline procedures for achieving these goals through a systematic review process. In addition, they are designed to meet the minimum requirements for monitoring as set forth in the guidelines provided by the PA Department of Labor and Industry Bureau of Workforce Development & Administration (BWDA) and Bureau of Workforce Partnership & Operations (BWPO).

The principle focus of the monitoring effort is to ensure effective and efficient methods of operation across all programs, activities, and/or sub-recipient vendors as well as to enhance the overall quality of service, both internally, as well as externally with program vendors and service providers. Monitoring will be used to identify weaknesses in the overall administration of programs and activities and with the delivery of services and to recommend immediate steps to correct those weaknesses. In those cases where immediate action is required, the Executive Director of the Pocono Counties WDB assumes responsibility to ensure recommendations are acted upon in a timely manner.

2. EFFECTIVE DATE

3/1/20

3. IMPLEMENTATION

The Pocono Counties WDB authorizes the employment of a Staff to be employed and referred to as the Pocono Counties Independent Monitor. The Independent Monitor reports directly to the Executive Director of the local Board. The employed Independent Monitor will follow a yearly monitoring schedule as developed in conjunction with and approved by the WDB Executive Director.

4. AREAS TO BE MONITORED

Assuring compliance with the Monitoring Schedule, as described above, the following areas of program administration and operation will be monitored on a yearly basis (notwithstanding, the implementation of a local Risk Assessment Policy):

- WIOA Title I Adult Activity(ies) (min. 5 per year/service provider)
- WIOA Title I Dislocated Worker Activity(ies) (min. 5 per year/service provider)
- WIOA Title I Youth Activity(ies) (min. 4 IS/4 OS per year/service provider)
- PA CareerLink Operator/Title I Service Provider Procurement/ Oversight
- PA CareerLink® Oversight/EO Compliance Review
- Subcontractor/Program Vendor Agreements/Oversight
- Fiscal Office Financial Management and Control

Monitoring efforts, addressing the areas listed above will be focused as follows:

Adult/Dislocated Worker/Youth Services & Other Projects, as appropriate:

- Compliance with eligibility requirements
- Programmatic and administrative accountability
- Service Providers
- Compliance with accepted methods of procurement
- Individual Training Accounts (ITAs)
- On-the-Job Training (OJT) Contracts
- Work Experience/Transitional Employment Activities, if applicable
- Compliance with Supportive Service/Training reimbursement policies
- Achievement of performance measures
- Compliance with ADA/EEO requirements

Additional Youth Program Requirements

- Fourteen program design elements
- Child Labor Law compliance, if applicable
- Individual Service Strategy (ISS)
- Follow-up procedures
- 75% Out-of-School requirement
- 20% work experience requirement

CareerLink Operator/Title I Service Provider

- RFP Process for Procurement of the CareerLink Operator/Title I Service Provider
- Review of Operator Agreement/Responsibilities
- Review of Title I Service Provider Agreement
- Review of Operator/Title I Service Provider Reporting requirements
- Evaluation of Operator/Title I Service Provider performance

- Compliance with the following legal documents: Partner Memorandum of Understanding (MOU)/ Infrastructure Funding Agreement (IFA)/Resource Sharing Agreement Budget (RSAB);
- Customer satisfaction
- Continuous improvement strategies
- Internal flow and procedures
- Best practices

Subcontractor/Program Vendor Agreements/Oversight

- RFP Process for Procurement of Program Services
- Review of Subcontractor Agreements
- Subcontractor Reporting Requirements
- Evaluation of Program Performance/Effectiveness

Financial Management and Controls

- Compliance with L & I Single Audit and Financial Management guidelines.
- Review of Fiscal Office accounting systems and controls.
- Disbursement of funds to subcontractors/vendors and cost allocation methods
- Review of Fiscal Office reporting and record retention practices
- Fiscal Office oversight of subcontractor performance and compliance with terms of agreements
- Bonding and Insurance requirements
- Procurement Practices and Procedures
- Property Management
- Conflict of Interest Policy

EO Compliance Review

- Compliance with public notice requirements
- Review of Administrative EO Organizational Structure
- EO Complaint and Grievance Policy
- EO staff knowledge/training
- EO Record Retention

4. RISK ASSESSMENT POLICY

In accordance with WSP No. 07-PY2015, Appendix A, the PCWDA has formulated a policy of a policy of risk assessment for all training and service providers who are receiving or will receive funds from the Workforce Investment Act. The policy will serve as a guide for the type and frequency of monitoring of all providers during any twelve-month fiscal period.

- A. Any service provider receiving funds from PCWIA for the first time shall be automatically subject to a full on-site review within the contract period. The areas covered in the review will include the following:
 - RECORDKEEPING
 - FISCAL ACCOUNTABILITY
 - PERFORMANCE
 - COMPLIANCE WITH CONTRACT PROVISIONS
 - EEO COMPLIANCE
 - ADA COMPLIANCE

1. Yearly selection of providers to be monitored will be based upon a number of criteria, including, but not limited to, previous review results, internal staffing changes, relocation or expansion of facilities, failure to promptly address previously identified deficiencies.
2. Any or all providers, regardless of size or prior performance, will be subject to an on-site review at least once every three years.
3. Providers with multi-year agreements will be subject to yearly reviews prior to approval of extensions.
4. All service providers will be required to respond, in writing, to all deficiencies cited within thirty days of their receipt of review findings.
5. If a provider receives a high risk evaluation for two consecutive contract periods, a copy of the findings will be forwarded to the Pocono Counties Workforce Development Board for review and consideration of actions that could result in their permanent termination as a provider.

The following scoring system will be used as a guideline for determining whether a provider is high risk.

PROVIDER RISK ANALYSIS

1. During the past year, has there been a change in the provider's personnel, policies, organizational structure or location?
 15 points – major change
 8 points – significant change
2. In the past, have there been any instances of disallowed costs or concerns about financial stability?
 20 points – More than one instance
 15 points – A single instance
3. During the past two years, have there been any major monitoring or audit findings, either financial or performance?
 25 points – Significant violation of WIA regulations or contract provisions were found
 15 points – some violations were found but have since been corrected
4. What is the contractor's current WIA allocation?
 15 points - \$50,000 or more
 10 points - \$25,000 or more
 5 points – less than \$25,000

Any provider whose assessment results in a score of twenty-five points or more in any fiscal period will automatically be considered high risk.

PROCEDURES FOR PERFORMANCE MONITORING AND FOLLOW-UP ACTIVITIES

The following will serve as a standard procedure to WDB Monitoring staff in the performance of the monitoring function under the requirements of the Workforce Innovation and Opportunity Act.

A. Monitoring Methods

The WDB staff Monitor will devise, on a yearly basis and in collaboration with the LWDB Executive Director, a regular schedule of oversight activities in accordance with the Internal Monitoring Procedures Guide. In the course of these reviews, a variety of methods will be utilized, either singularly or in a combination, to accomplish this task. These can include record reviews, personal interviews with program staff and/or participants, or on-site reviews, whereby the Monitor will conduct a personal visit to the site. In the latter case, the Monitor will inform the subcontractor by letter or email, at least one week in advance of the visit. The contact will include the date and time of the visit and any additional pertinent information.

B. Exit Interview

Upon completion of an on-site review, the Monitor will schedule an exit interview with the administrative head (or appropriate staff) of the respective subcontractor to appraise the latter, by oral summary, of the review findings. In addition, the Monitor should recommend corrective actions that can be taken by the subcontractor to remedy any problems that may have been identified. If deficiencies have been uncovered by the site review, the Monitor will inform the service provider/vendor that a follow-up inquiry and letter will be forthcoming detailing corrective action needed.

C. Corrective Action Procedures

- Following each monitoring review, the Monitor will prepare a written report within thirty (30) days of the review date(s) which summarizes the findings. The report will contain the subject areas covered in the review and will cite any deficiencies discovered during the process.
- Once the report has been completed, the Monitor will submit the document to the WDB Executive Director as well as appropriate entity under whom the activity falls (i.e., subcontractor; appropriate internal staff; worksite supervisor). The report will include both strengths and weaknesses and detail any program's deficiencies, if applicable, and stipulating a 30-day time frame (from the date of issuance of the report) for completion of a Corrective Action Plan (CAP).
- A CAP will be prepared by the appropriate management personnel and/or service provider/vendor within 30 days of the issuance of the initial report detailing follow-up activities to ensure that corrective action is taken.
- If a second follow-up review/visit by the Monitor is determined to be warranted, based on the CAP response, the Monitor will make the appropriate review internally or the service provider/vendor will be informed by letter of a date for a second visit. If the corrective action requires only the receipt of information, a copy, upon receipt, will be placed on file and a second copy distributed to the Monitor.

D. Follow-Up

If problems encountered are determined to be major deficiencies within the system, the Monitor will indicate on the report a follow-up date upon which to return to the service provider/vendor and determine whether the recommended corrective actions have been implemented. Unresolved deficiencies will be referred back to the LWDB Executive Director, who will, in turn, correspond with the service provider/vendor indicating that the latter should institute the necessary corrective action as soon as possible. It will then become the Monitor's responsibility to ensure that these actions have been taken within the specified time frame and make final report of such to the LWDB Executive Director.

E. Local Workforce Development Area

When the monitoring review involves the internal operations of the Local Workforce Development Area, the Monitor will address all areas as defined on Page 3 of this guide with copies of all reports generated submitted to the LWDB Executive Director for review. If major concerns are identified, the Monitor will submit, in writing, a detailed description of the concern(s) to the LWDB Executive Director. The LWDB Executive Director will review the report and dictate any necessary corrective action to the appropriate administrative personnel. Within 30 days, the administrative personnel assigned must produce a written report to the LWDB Executive Director detailing corrective action taken. Following review of the corrective action report, the LWDB Executive Director will inform the Monitor if additional review is necessary. If so, the monitor will conduct a follow-up review of the concern(s) with a final report generated. In the event that corrective actions have not been taken or are determined to be insufficient, the LWDB Executive Director will address the concern(s) with the appropriate administrative personnel and institute reprimands, as appropriate.

F. Monitoring Review Procedure/Tools

WIOA Title I Adult/Dislocated Worker Activity(ies)

WIOA Title I Youth Activity(ies)

PA CareerLink Operator

PA CareerLink®/Affiliate Site/EO Compliance

Title I Service Provider(s)

Subcontractor

Fiscal Office Financial Management and Control

All tools are completed by the WDB Monitor and maintained, as packaged by activity monitored, in the administrative office of the LWDB. Said package of information will then be made available for review to any authorized local, State, or Federal entity or members of the Executive Committee of the LWDB.