



MONITORING POLICY

INTRODUCTION

Workforce Investment Act of 1998 (WIA)

Program Oversight (WIA, Section 117, (d) 4) The local board in partnership with the chief elected official, shall conduct oversight with respect to local programs of youth activities authorized under section 129, local employment and training activities authorized under section 134, and the one-stop delivery system in the local area.

In accordance with the Workforce Investment Act, Final Rule, CFR part 652 et al, each recipient and subrecipient must conduct regular oversight and monitoring of its WIA activities and those of its subrecipients and contractors in order to:

- (1) Determine that expenditures have been made against the cost categories and within the cost limitations specified in the act and the regulations.
- (2) Determine whether or not there is compliance with other provisions of the Act and WIA regulations and other applicable laws and regulations.
- (3) Provide technical assistance as necessary and appropriate.

The Monitoring Policy will insure that the Lehigh Valley Workforce Investment Board, Inc. is in compliance with the Workforce Investment Act of 1998.

METHODOLOGY

1. The Lehigh Valley Workforce Investment Board, Inc. in conjunction with the Chief Elected Officials, will ensure that monitoring/oversight of the Lehigh Valley Workforce Investment Area's services and activities are conducted in accordance with Federal, State, and local statutory/regulatory requirements. The Lehigh Valley Workforce Investment Board, Inc. will assure the quality of administrative, program operations and CareerLink activities. The following five statewide requirements for monitoring/oversight and evaluation will be addressed by the Lehigh Valley Workforce Investment Board, Inc.:
 - a) Risk assessments to select most likely non-compliant operators
 - b) Review(s) of single audits
 - c) Review(s) of quality of service to enhance program accountability
 - d) On-site visits to review records, documents and observe operations
 - e) Review(s) of service provider's financial and progress reports

The above strategies will address and identify those service providers in need of technical assistance.

2. The following methods are additional options that may be utilized as appropriate:
 - a) Further evaluations by third parties (consultants)
 - b) Telephone calls
 - c) Random surveys
 - d) Making arrangements for limited-scope audits of specific areas
 - e) Checking requirements for prior approval for certain activities
 - f) Desk reviews of reports and statistics
 - g) Email communications
 - h) Evaluations of news stories and features about service providers
3. Monitoring reviews will be conducted on an on-going basis. Service providers will be classified as either High Risk or Low Risk for the purposes of measuring program accountability. At a minimum, High-Risk providers will be monitored annually. Low Risk providers will be monitored, at a minimum, once every three years. The Lehigh Valley Workforce Investment Board, Inc. (LVWIB) has the discretion to increase monitoring frequency. **Monitoring on-site reviews must be performed during the contract period.**

Factors the LVWIB may consider when assessing a service provider's risk.

- a. Size of budget
- b. Prior monitoring and audit results
- c. Number of participants
- d. Major changes in personnel or practices since last review

- e. First time operator
 - f. History of disallowed costs
 - g. Structure for provision of services
 - h. Number of complaints
4. Monitoring reports will include, but not be limited to, name of provider, date(s) and type(s) of activities, total amount and source (adult, youth, dislocated worker) of WIA funding, services provided, staff interviewed, scope of review, and a summary of findings that include program strengths, concerns, deficiencies and areas where technical assistance may be needed. All contacts and reviews will be recorded. Copies of all monitoring reports will be maintained to document monitoring reviews. A corrective action plan to rectify any findings must be submitted to the LVWIB monitoring/quality assurance staff within 30 days of the issuance of the report. Follow-up activities will be documented and corrective action taken within 90 days. Monitoring results will be made available for State and/or Federal review.
5. Monitoring reports/results will be made available to the Executive Director of the Lehigh Valley Workforce Investment Board, Inc. within 45 days. Reports will also be made available to the Lehigh Valley Workforce Investment Board to assist with strategic planning efforts and the appropriate Workforce Investment Board committee.

Fiscal Agent

Monitoring of the fiscal agent will be conducted once per program year. The following areas will be reviewed.

- Procurement methods;
- Financial requirements;
- Internal controls;
- Obligations and expenditures: and
- Audit requirements

CareerLink Delivery System and CareerLink Operators

Monitoring of CareerLink development and operations will be conducted on an on-going basis. The following areas will be reviewed.

- Compliance with the following legal documents: Combined Business Plans and Resource Sharing Agreements, Memoranda of Understanding, Modifications to Agreements, Operator Consortium Agreements;
- Adherence to the chartering criteria;
- ADA requirements for sites;
- Customer satisfaction (both job seekers and employers);

- Progression of services (core-intensive-training);
- Continuous improvement strategies; and
- Best practices

Subrecipients

Contracts with subrecipients will be monitored for compliance on a risk assessment basis as outlined in the Methodology. The following areas will be reviewed.

- Fiscal and Procurement;
- Programmatic accountability;
- Compliance with contract provisions;
- Compliance with EEO requirements; and
- Compliance with ADA requirements

Youth Services:

Service providers will be monitored, on a risk assessment basis. The following areas will be reviewed.

- Fiscal and Procurement;
- Programmatic accountability;
- Compliance with contract provisions;
- Compliance with EEO compliance;
- Compliance with ADA requirements;
- Ten program elements;
- Child Labor Laws compliance;
- Individual Employment Plans;
- Follow-up procedures;
- 30% Out-of-School Youth expenditures; and
- Performance standards

Adult Services:

The Adult Services category includes services provided to WIA adults, dislocated workers, incumbent workers, welfare recipients and any other target groups. Adult services provided by a subrecipient will be monitored on a risk assessment basis.

Individual Training Accounts (ITAs)

The following areas will be reviewed.

- Eligibility for Individual Training Accounts (ITAs);
- Deduction of Pell grants; if applicable;
- Coordination with other agencies serving the same target group;
- Leveraging of training services; and
- Occupational skill training needs of the local area

On The Job Training (OJT)/Work Experience/Subsidized Employment

The following areas will be reviewed.

- Fiscal and Procurement;
- Programmatic accountability;
- Compliance with contract provisions;
- Compliance with EEO requirements; and
- Compliance with ADA requirements

ABE/GED Classes, Rapid Response Contracts, Job Readiness/Job Preparation Workshops

Services provided by a subrecipient will be monitored on a risk assessment basis. The following areas will be reviewed.

- Fiscal and Procurement;
- Programmatic accountability;
- Compliance with contract provisions;
- Compliance with EEO requirements; and
- Compliance with ADA requirements

Other Contracts:

The other category includes those contracts not specified above.

- Fiscal and Procurement;
- Programmatic accountability;
- Compliance with contract provisions;
- Compliance with EEO requirements; and
- Compliance with ADA requirements

Lehigh Valley Workforce Investment Area Risk Assessments For Service Providers

Date _____

	Provider	Provider	Provider	Provider	Provider
Risk Factors					
SIZE OF BUDGET					
Prior monitoring/audit results					
Number of participants					
Change in personnel/practices					
First time service provider					
History of disallowed costs					
Structure for provision of services					
NUMBER OF COMPLAINTS					
Total Number of Points					

POINT RANGE: HIGHEST RISK = 100 POINTS ←→ LOWEST RISK = 0 POINTS

**LEHIGH VALLEY WORKFORCE INVESTMENT AREA SCORING
SYSTEM FOR SERVICE PROVIDER RISK ASSESSMENTS**

1. What is the size of the budget in comparison to other similar service providers?
12.5 points = Large budget
6 points = Moderate budget
0 points = Small budget
2. What is the extent of recent audit/monitoring findings?
12.5 points = Substantial findings
6 points = Some findings
0 points = No findings
3. Number of participants?
12.5 points = Large number of participants
6 points = Moderate number of participants
0 points = Small number or no participants
4. Change in provider's personnel or practices?
12.5 points = Extensive change
6 points = Some change
0 points = Little or no change
5. First time service provider?
12.5 points = Yes
0 points = No
6. History of disallowed costs?
12.5 points = More than one
6 points = Single instance
0 points = None
7. Structure for provision of services?
12.5 points = No services provided directly by contractor
6 points = Contractor provides some services and purchases some services
0 points = Contractor's staff provides all or nearly all services directly
8. Number of complaints by staff/customers?
12.5 points = One or more
0 points = None