

SDWP Operations Manual
Chapter 8
Oversight and Monitoring

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I. Introduction

The San Diego Workforce Partnership (SDWP) has established an oversight and monitoring process that includes: an annual onsite review of all SDWP-funded programs through monitoring visits, and ongoing reviews of Subrecipient's and Eligible Training Providers List (ETPL) Providers to assess the quality and level of performance. These activities are required to fulfill the SDWP's mandated oversight responsibilities in accordance with the Workforce Innovation and Opportunity Act (WIOA).

II. Oversight and Monitoring

Oversight and monitoring is a regular, systematic review of programmatic and fiscal activities, administrative systems and management practices to determine if they are appropriate, effective and in compliance with the terms of the contract, WIOA rules and regulations, Department of Labor (DOL) requirements and EDD directives, and SDWP policies and procedures. Oversight and monitoring serve as an important mechanism to identify and document necessary corrective actions, provide technical assistance, and track progress.

A. Employment and Development Department (EDD)

EDD monitors SDWP Subrecipients and ETPL Providers on a yearly basis.

B. Third Party Monitor

SDWP contracts with a third party for the provision of monitoring services, in accordance with the policies and procedures outlined in this Chapter.

C. SDWP Contract Administrator

SDWP staff will provide ongoing oversight for all contracts, including regular reviews of the quality and performance of each Subrecipient & ETPL Providers.

D. Subrecipient's and ETPL Providers

All Subrecipient's and ETPL Providers must monitor their subrecipients in accordance with the guidance laid out in this chapter to ensure funds are used for authorized purposes.

III. Scope

Monitoring is performed through desk reviews and onsite visits. Programmatic and fiscal monitoring activities include but are not limited to:

- A review of program and participant services to include the intake and referral process, eligibility certification, priority of service, registration, objective assessment, classroom training, OJT, work experience and supportive services.
- Monitoring also includes a review of program administration and management practices including fiscal and accounting procedures, reporting, internal control systems (e.g. protection of Personally Identifiable Information (PII)), and non- discrimination and Equal Opportunity (EO) policy and procedures.

A. Frequency

Programmatic and fiscal monitoring is conducted each year with a minimum of two on-site visits per year. If the particular program being monitored is of six months or less duration, only one on-site visit is conducted. Equal Opportunity WIOA Section 188 monitoring is conducted each year.

B. Monitoring Report

Each on-site monitoring visit is documented by a written report. The monitoring reports are official records of SDWP and are used to review Subrecipient's and ETPL Providers programs at a given point in time. The reports provide the background of the program, status of follow-up on previous findings (if applicable), current findings and recommendations (if any) for corrective action along with a timeline for implementation. The reports constitute the basis for future program assessment and evaluation.

IV. Corrective Action

If gaps or deficiencies are found during the monitoring process, the monitoring report will include recommendations to address the identified problem areas. The type and extent of the issues identified will dictate the required corrective action. Recommended actions may include:

- Technical Assistance: Monitor will recommend the provision of technical assistance or additional guidance when a deficient condition is caused by inadequate information or training.
- Policy/Procedural Changes: The monitor will submit appropriate recommendations for procedural changes to result in acceptable performance.
- Corrective Action Plan: Monitor will recommend the creation of a corrective action plan if there are deficiencies which must be addressed by the Subrecipient and ETPL Provider.

A. Corrective Action Plan

The monitor will work with the Subrecipient's and ETPL Providers to outline a corrective action plan which addresses the causes of the problem and aims to prevent future occurrence. Refer to ***SDWP Operations Manual, Chapter 4, Part I and Part II, Program Activities for the Corrective Action Policy.***

B. Corrective Action Implementation

Subrecipient's and/or ETPL Provider's must implement the recommended corrective action within the timeframe indicated in the monitoring report. The implementation will be closely tracked by the monitor (1) to determine the overall efficiency and effectiveness of the approach, and (2) to measure progress toward resolving the problem. Subrecipient's and ETPL Providers are required to respond in writing to the monitor's recommendations to acknowledge that the corrective action plan is being implemented.

V. Follow-up

As the final step in the monitoring process, the monitor will follow-up on corrective action recommendations and the results of any technical assistance. The monitor may also extend the target date for completion of the corrective action if the Subrecipient's and ETPL Providers request for extension is reasonable and provides justification for such an action.

A. Methodology

Follow-up may be achieved as follows:

- **Desk Review:** If the monitoring finding can be addressed through the submission of documentation, follow-up may be achieved through verification of back-up documentation submitted by the Subrecipient's and ETPL Providers in response to a monitoring report finding.
- **Off-Cycle Visit:** If the corrective action is crucial to the operation of the program or is required immediately to resolve a problem involving questioned costs, a follow-up visit may be scheduled to confirm that corrective action has been implemented.
- **Part of Regular Monitoring:** If the corrective actions will require more time to implement or is of a less severe nature, the action will be followed-up during the course of the next regular monitoring visit.

VI. Monitoring Tools

A. WIOA Programmatic Compliance Checklist

ATTACHMENT - WIOA PROGRAMMATIC COMPLIANCE CHECKLIST is a management tool used by monitors to ensure that Subrecipients and/or ETPL Providers are complying with legislative requirements of the WIOA programs.

B. Participant File Compliance Checklist

The Participant File Checklists are used by monitors to conduct file reviews on a sampling of registered participant's information and aggregate program information through the review and analysis of CalJOBS data. All participant program activities and services will be examined to ensure programmatic compliance. Refer to ***SDWP Operations Manual, Chapter 4, Part I and Part II Program Activities***.

C. Fiscal and Procurement Monitoring Checklist

ATTACHMENT - FISCAL AND PROCUREMENT MONITORING CHECKLIST are used by monitors to conduct fiscal and procurement monitoring of Subrecipients and ETPL providers are not subject to this type of monitoring.

D. Equal Opportunity WIOA Section 188 Compliance Checklist

ATTACHMENT - EQUAL OPPORTUNITY WIOA SECTION 188 COMPLIANCE CHECKLIST is a management tool used by monitors to ensure that Subrecipient's and ETPL Providers are complying with legislative requirements of the WIOA programs. Refer to ***SDWP Operations Manual, Chapter 9: Nondiscrimination & Equal Opportunity Policy and Complaint Procedures***.

E. Participant Questionnaire

ATTACHMENT – PARTICIPANT QUESTIONNAIRE allows monitors to understand the customer experience and validate the performance of the Subrecipients and ETPL Providers from the perspective of the participant. Monitor will select a sampling of participants for interview.

F. Worksite Visit

A worksite visit may be conducted at an employer(s) place of business and ETPL Provider locations to observe the work setting and environment; and review the administrative systems and the business' capacity to insure fiscal integrity and compliance with legislative requirements of the WIOA Programs.

VII. Attachments

WIOA Programmatic Compliance Checklist

Fiscal and Procurement Monitoring Checklist

Equal Opportunity WIOA Section 188 Compliance Checklist

Participant Questionnaire