



**OPERATIONS MANUAL
CHAPTER 8
OVERSIGHT AND MONITORING**

REVISED NOVEMBER 14, 2016

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Sec 1. Introduction

The San Diego Workforce Partnership (SDWP) has established an oversight and monitoring process that includes: (1) an annual onsite review of all SDWP-funded programs through monitoring visits, and (2) ongoing reviews of Operators and/or Service Providers' performance 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).

Sec 2. 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.

(a) Responsibility and Scope

Oversight and monitoring serve as an important mechanism to identify and document necessary corrective actions, provide technical assistance, and track progress.

- SDWP program specialists provide ongoing oversight for all contracts, including regular reviews of the quality and performance of each Operator and/or Service Provider.
- SDWP contracts with a third party for the provision of monitoring services, in accordance with the policies and procedures outlined in this Chapter. The external monitor is responsible for programmatic and fiscal reviews which include assessment of all program activities and services, all management systems and practices supported with federal and state funds to ensure legal, fiscal, administrative, and programmatic compliance.
- SDWP contracts with a third party for the provision of ADA compliance reviews.
- All Operators and/or Service Providers must monitor their subrecipients in accordance with the guidance laid out in this chapter to ensure funds are used for authorized purposes.

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. ADA compliance monitoring includes a review of Operator and/or Service Provider facilities.

(b) 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. ADA compliance reviews are conducted every two years.

Sec 3. 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 the Operators' and Service 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.

Sec 4. 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 Operator and/or Service Provider.

(a) Corrective Action Plan

The monitor will work with the Operators and/or Service Providers to outline a corrective action plan which addresses the causes of the problem and aims to prevent future occurrence. The format of the plan should follow the template specified in the Corrective Action Policy.

(b) Corrective Action Implementation

Operators and/or Service Providers 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. Operators and/or Service Providers are required to respond in writing to the monitor's recommendations to acknowledge that the corrective action plan is being implemented.

Sec 5. 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 Operators' and/or Service 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 Operators and/or Service 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.

Sec 6. Monitoring Tools

(a) WIOA Compliance Checklists

The WIOA Programmatic and Fiscal Compliance Checklists (**Attachments**) are management tools used by monitors to ensure that Operators and/or Service Providers are complying with legislative requirements of the WIOA programs.

(b) Participant File Checklists

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. (**Adult & Youth Participant File Checklists are in Chapter 4, Part 1 & 2, Program Activities of the SDWP Operations Manual**).

The checklists contain citations of many important sections of WIOA Law and Regulations, provisions of State Directives and federal requirements, as well as SDWP Operations Issuances. The checklists will be updated as needed by the monitors, in conjunction with SDWP staff, to ensure all current requirements of federal, state, local and SDWP contract clauses are included.

(c) Participant Interviews

Participant interviews allow monitors to understand the customer experience and validate the performance of the Operator and/or Service Provider from the perspective of the participant. Monitor will select a sampling of participants for interview.

Sec 7. Attachments

[Attachment - WIOA Programmatic Compliance Checklist](#)

[Attachment - WIOA Fiscal Compliance Checklist](#)