

# **OPERATIONS MANUAL CHAPTER 8: OVERSIGHT AND MONITORING**

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## I. INTRODUCTION

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

## II. OVERSIGHT AND MONITORING

Oversight and monitoring are 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, Employment and Development Department (EDD) directives, and the Workforce Partnership 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 the Workforce Partnership on a yearly basis, so that will include Subrecipient's, ETPL providers, OJT providers, and other entities that receive WIOA funding.

### B. THIRD PARTY MONITOR

The Workforce Partnership contracts with a third party for the provision of Fiscal, Procurement, and Equal Opportunity (EO) monitoring services, in accordance with the policies and procedures outlined in this Chapter.

### C. THE WORKFORCE PARTNERSHIP PROGRAM MONITOR

The Workforce Partnership compliance staff conducts program monitoring services, in accordance with the policies and procedures outlined in this Chapter.

### D. THE WORKFORCE PARTNERSHIP CONTRACT ADMINISTRATOR

The Workforce Partnership staff will provide ongoing oversight for all contracts, including regular reviews of the quality and performance of each Subrecipient, ETPL provider, and OJT provider.

### E. SUBRECIPIENT'S, ETPL PROVIDERS, AND OTHER PROVIDERS

All Subrecipient's, ETPL providers, and other entities that receive WIOA funds 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. 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;

- 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
- A review of Nondiscrimination and Equal Opportunity (EO) policy and procedures.

## A. FREQUENCY

Programmatic and fiscal monitoring is conducted each year with a minimum of one on-site visits per year. If the 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 once per year.

## B. MONITORING REPORT

Each on-site monitoring visit is documented by a written report. The monitoring reports are official records of the Workforce Partnership and are used to review Subrecipient's, ETPL providers, and OJT 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, ETPL provider, and OJT 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 the Workforce Partnership *Operations Manual, Chapter 4, Part I and Part II, Program Activities for the Corrective Action Policy*.

### B. CORRECTIVE ACTION IMPLEMENTATION

Subrecipient's, ETPL providers, and OJT 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. Subrecipient's, ETPL providers, and OJT 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, ETPL providers, and OJT 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, ETPL providers, and OJT 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 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 are complying with legislative requirements of the WIOA programs.

### B. PARTICIPANT FILE MONITORING CHECKLIST

The Participant File Monitoring 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 the ***San Diego Workforce Partnership Operations Manual, Chapter 4, Part I and Part II Program Activities.***

### C. FISCAL AND PROCUREMENT ON-SITE MONITORING GUIDE AND RISK ASSESSMENT WORKSHEET

**ATTACHMENT - FISCAL AND PROCUREMENT ON-SITE MONITORING GUIDE** as well as the **ATTACHMENT – RISK ASSESSMENT WORKSHEET** is used by monitors to conduct fiscal and procurement monitoring of Subrecipients. The third-party monitor will be responsible for scoring the Subrecipient's risk assessment worksheet. ETPL and OJT 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, ETPL providers, and OJT providers are complying with legislative requirements of the WIOA programs. Refer to the ***San Diego Workforce Partnership 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, ETPL providers, and OJT 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 OJT providers, ETPL provider, and paid work experience (youth only) locations to observe the work/training 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. REFERENCED ATTACHMENTS

**WIOA Programmatic Compliance Checklist**

**Fiscal and Procurement On-site Monitoring Guide**

**Equal Opportunity WIOA Section 188 Compliance Checklist**

**Participant Questionnaire**

**Risk Assessment Worksheet**