



## **Workforce Solutions for North Central Pennsylvania**

### **Local Oversight Policy**

#### **PURPOSE**

The North Central Workforce Development Board/Workforce Solutions has the responsibility to provide oversight and monitoring of programs and activities as recipient of federal and state funds administered directly by the board. This policy is intended to ensure compliance with the Workforce Innovation and Opportunity Act (WIOA) and state requirements while at the same time, providing guidance for continuous improvement and technical assistance.

#### **BACKGROUND**

Workforce Solutions, in conjunction with the Chief Elected Official, must ensure compliance with applicable federal, state, and local laws and regulations as well as contract provisions, policies, official directives, and grant agreements. The board's oversight responsibilities must include, but are not limited to the following:

- Administrative Oversight
- Programmatic Oversight
- Fiscal Oversight and Reporting

#### **REQUIREMENTS**

Workforce Solutions in consultation with the Continuous Improvement Committee of the board has developed the following methods of oversight:

- On-site visit – both fiscal and programmatic monitoring to ensure all funds are adequately safeguarded, program performance goals are met, and local sub-contractors are programmatically, operationally, and fiscally compliant

- Desk Reviews – review of both fiscal and programmatic information to test compliance to identify potential or recurring problems, to prepare for more in-depth on-site visits, and to conduct more systematic and continuous oversight
- Random sampling – a random sample will be selected to help identify compliance violations, questioned costs, and/or potential weaknesses in performance
- Survey – surveys may be used to help identify compliance with violations, questioned costs, or potential weaknesses in performance, as well as to capture promising practices or needs for technical assistance

**NOTE** – All participant data or any data that contains Personally Identifiable Information (PII) must be sent using secure e-mail, data encryption, or through a secure document repository. Refer to the board’s policy regarding PII.

### *Monitoring Overview*

Workforce Solutions has developed written monitoring tools that include supporting documentation. In addition, the board will on occasion enter into an agreement with another workforce development board to provide monitoring services. In this case we utilize the tools that board has developed for their reviews, making accommodations for local policies. Workforce Solutions monitors internal and external LWDA programs and operations of service providers. The varying requirements of the funding streams involved are taken into consideration when designing monitoring tools. At a minimum, monitoring tools include information such as, but not limited to:

- Name of the agency;
- Date(s) of the monitoring;
- Name of individual performing the monitoring;
- Services or activities provided;
- Total amount of the contract and sources of the funding;
- Date(s) of the oversight activity
- Staff interviewed; and
- A summary of the results that include program strengths, concerns, deficiencies and areas where technical assistance may be needed

### *Oversight Process*

The staff responsible for the review will submit a written monitoring report within thirty (30) days of the monitoring visit to the agency being reviewed. A Corrective Action Plan to rectify any findings must be submitted to the Executive Director of Workforce Solutions within thirty (30) days of receipt of the board report or as requested in writing by the staff. Follow-up

activities will be conducted within 90 days of the date of the corrective action plan approval, if needed.

Staff will prepare a summary of monitoring findings following any reviews, along with the formal report, to the Continuous Improvement Committee of the board. The committee report will be included in the mailing to the full board. The action of the committee via the committee report is part of the consent agenda. It is up to each board member to review all items included within the consent agenda. However, any formal action necessary as a result of any monitoring findings will be presented to the full board for action. The Continuous Improvement Committee will perform an annual evaluation of the oversight function to determine its effectiveness; and will develop the written oversight process/plan to be used. Monitoring results will assist the board with strategic planning and continuous improvement efforts, as this may identify an area needing increased board focus.

Workforce Solutions staff provide quality technical assistance to service providers in enhancing program performance and accountability. If deficiencies or concerns are identified, Workforce Solutions works closely with the service provider in correcting these issues. Service providers that exhibit a pattern of inconsistency in providing quality services are considered during risk assessment. This action allows staff the opportunity to make adjustments necessary to create a sound oversight system for the North Central Workforce Development Area.

### *Risk Assessments*

Workforce Solutions uses a risk assessment approach to narrow and concentrate their scope of review. This method substantially increases the overall risk of negative consequences. There are four steps involved in conducting a risk assessment, and examples of pertinent questions to accomplish these steps follow:

1. Define the scope of the risk being assessed. Which providers involve the most risk exposing the board to adverse consequences;
2. Identify frequency in which to monitor. In determining the frequency, we consider the level of vulnerability to the board if a provider's compliance with programmatic and fiscal system requirements is not systematically and regularly monitored;
3. Identify the factors used to assess risk. The following factors are considered and assigned a point value to the overall scoring. The numerical ratings can then be used to help us determine how to allocate our monitoring resources.
  - ✓ Is the service provider new to operating or managing a similar contract or hasn't done so in the past 5 years?

- ✓ Does the provider have new personnel or new or substantially changed systems?
- ✓ Does the provider also receive direct federal funds?
- ✓ Does the provider lack effective operational and fiscal procedures and controls?
- ✓ Does the provider receive a Single Audit in accordance with 2 CFR 200, Subpart F – Audit Requirements of this part, and the extent to which the same or similar sub-award has been audited as a major program; and
- ✓ What is the provider’s contract award and what percentage of our allocation do they receive?

Service providers are classified as either “High Risk,” “Medium Risk,” or “Low Risk” for the purposes of measuring program accountability. At a minimum, all providers are monitored annually. The following frequency will apply based on risk determination:

- High Risk – Programmatic review quarterly, fiscal review quarterly, administrative review – quarterly
- Medium Risk – Programmatic review quarterly; fiscal review semi-annually; administrative review semi-annually
- Low Risk – Programmatic review quarterly; fiscal and administrative review annually

In any case, Workforce Solutions has the discretion to increase monitoring frequency. Please see Attachment A for a copy of the Scoring System for Risk Assessment. In addition, Administrative oversight is conducted annually; Programmatic oversight is conducted quarterly; and Fiscal oversight is conducted a minimum of annually for all providers.

Adult, Dislocated Worker, and Youth program services will be monitored for compliance with federal and state requirements for documenting services in case files. This includes, but is not limited to, ensuring that accurate, complete and timely data entry of types of services and dates of services are completed in the state system of record., the Commonwealth Workforce Development System (CWDS), as well as all participant files. Monitoring of Adult, Dislocated Worker, and Youth Program exits will be reviewed, ensuring that WIOA participants are exited from the program after 90 days without a service, using the last date of services as the exit date.

Monitoring via random sampling methodology will be conducted to monitor the use of self-certification and self-attestation of programs applications for all WIOA Title I programs as identified in the eligibility policy. The Title I program services contractor and the one-stop

Operator will be responsible to ensure that regular random monitoring of participant files is conducted to ensure compliance with all federal, state, and local requirements.

### **PA CareerLink Monitoring**

At a minimum, all PA CareerLink® centers are monitored for compliance each program year. Monitoring of PA CareerLink® activities and operations are conducted on an ongoing basis by reviewing:

- Compliance with the following legal documents: WIOA Local Plan, Resource Sharing Agreement Budgets, Memorandum of Understanding, and other One-Stop required agreements
- Adherence to the board's PA CareerLink Certification Criteria
- Customer satisfaction (both job seekers and employers)
- Evaluation of performance and operational systems
- Qualitative and Quantitative analysis
- Continuous improvement strategies
- EO/ADA Requirements for PA CareerLink® centers
- Effective practices
- Compliance with handling of Personally Identifiable Information

### **REFERENCES**

- WIOA Section 183
- 20 CFR – WIOA Final Rules and Regulations
- OMB – Uniform Administrative Requirements, Cost Principles, and Audit Requirements and Federal Awards
- Pennsylvania Department of Labor and Industry Workforce System Policy (WSP) No. 183-01

### **INQUIRIES**

Workforce Solutions for North Central Pennsylvania  
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Auxiliary aids and services available upon request to individuals with disabilities  
Equal Opportunity Employer/Program