



**COUNTY OF SAN BERNARDINO
Workforce Investment Board
POLICY MANUAL**

No. 11

ISSUE 1

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By

EFFECTIVE: 11/5/07

SUBJECT

Monitoring and Oversight of One Stop Delivery System

APPROVED

Curt Hagman, Chairman

POLICY STATEMENT:

It is the policy of the San Bernardino County Local Workforce Investment Board (Local WIB) to require annual monitoring and oversight of the one-stop-delivery system of programs and activities funded under Title I of the 1998 Workforce Investment Act (WIA). To execute this policy the Local WIB has established protocols for conducting this process, to ensure program quality and fiscal integrity, which results in comprehensive reports of findings and documented follow-up for required corrective actions.

Process:

REFERENCES:

- WIA Sections 117(d)(4), 184(a)(2)(A), 184(a)(3)(A), and 184(a)(5)(A)
- Title 20 Code of Federal Regulations (CFR) Sections 667.400(c)(1), 667.410(a), and 667.410(3)(6)
- Title 29 CFR Parts 95 and 97
- Office of Management and Budget (OMB) Circular A-21, Cost Principles for Educational Institutions
- OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments
- OMB Circular A-122, Cost Principles for Non-Profit Organizations
- OMB Circular A-133 Audits of State, Local Governments and Non-Profit Organizations
- WIA Directive WIADOO-2, Subject: Procurement (August 21, 2000)
- WIA Directive WIADOO-4, Subject: Nondiscrimination and Equal Opportunity Procedures (November 16, 2000)
- WIA Directive WIADOO-7, Subject: Standards for Oversight and Instructions for Substate Monitoring

BACKGROUND: WIA Section 117(d) (4) and WIA Directive WIADOO-7 requires Local WIBs to conduct comprehensive monitoring of the one-stop delivery system using standardized tools and procedures to ensure WIA programs are in compliance with the mandates of Title I for federally funded workforce development activities. Annual monitoring will validate the quality of the delivery of services through the one-stop system at the Employment Resource Centers (ERC), advocate improvements when indicated, and require actions to correct formal findings of non-conformance with federal regulations, state directives, San Bernardino County and/or Local WIB policies and standards as identified under **Reference** in this policy. This policy implements the mandated requirements for oversight of the WIA one-stop delivery system.

PROCEDURES:

Monitoring Responsibilities

The Local WIB has delegated the responsibility of performing the annual oversight process to the Finance & Contract Unit of the San Bernardino County Department of Workforce Development (DWD). To meet its responsibilities, the Unit shall create a monitoring team that consists of a minimum of one (1) fiscal staff and one (1) contract staff.

Scheduling

The One-Stop Administrator and Employment Resource Center Supervisor shall be notified and confirmed in writing of the scheduled monitoring/review visit at least two (2) weeks prior to the date of the visit. The formal notification letter shall include the following information:

- Date
- Time
- Place of review
- Purpose of review
- Areas and materials to be reviewed
- Documents to be completed and returned to monitoring team prior to visit

Desk Review

Prior to the on-site visit a desk review will be conducted. This review will consist of a comprehensive review of documentation on file at the administration office of DWD. The data reviewed and analyzed will include:

- WIA Five-Year Strategic Local Plan (Local Plan) as modified and approved by the State.
- Memorandum of Understandings with all mandated Partner Agencies located at the ERCs or referring Partner Agencies located outside the center.
- Most recent fiscal year-end report to State of financial data and program performance.
- Current quarterly and monthly reports to State of financial data and program performance.
- Previous State monitoring reports of findings and corrective actions with DWD response and actions taken.
- Department policies and procedures for ERC administration and program implementation.
- Policies and procedures for procurement of equipment, goods, materials and services.
- Policies and procedures for implementing Nondiscrimination and Equal Opportunity mandates.
- Any other materials, as necessary, on file at the Administration Office that relates to the operations of the ERC

During the desk review a member of the monitoring team will conduct a fiscal audit of the following information:

- Current year expenditures for Title I WIA Adult Program and Title II WIA Dislocated Worker Program, specifically those expenditures in Supportive Services and Intensive Training.
- Administrative controls, policies and procedures
- Compliance with State reporting requirements for cost allocation, cost identification, obligations, and accruals.
- Compliance with State financial reporting, preparation and submittal
- Review of procurement practices.

All data obtained during the desk review and analyses will provide the monitors with areas to focus their review during the on-site monitoring.

On-Site Monitoring

The purpose of the on-site monitoring visit is to verify or disprove information derived from the Desk Review that may lead to identification of areas that are in non-conformance and/or require corrective actions. The on-site review will follow a standardized guide that is designed to assist the monitoring team in accomplishing a comprehensive evaluation. The process to be followed during the on-site review is as follows:

1. Entrance Conference: The monitoring team will meet with the DWD Deputy Director and the ERC supervisor to explain the purpose and scope of the monitoring visit and to identify how the team will approach the monitoring tasks.
2. Evaluation of Performance: The monitoring team will review ERC plans for meeting performance goals verify if ERC staff is aware of the goals. Monitoring will determine if actual performance is on track to meet performance standards and if not, what steps/plans are in place to direct the actions of staff to achieve the performance goals.
3. Observation of facility: A complete tour of the ERC will be conducted to assess the adequacy of the facility as it relates to the accessibility to the site, activities and programs by persons with disabilities and compliance with Americans with Disabilities Act. Observation that the center is comfortable and is a safe and healthy environment for customers and staff. That sufficient staff, resources, and equipment to deliver WIA services are present and in proper working order.
4. Review of Records: Validation of information gleaned from the desk review including, verification that compliance with WIA statutes, the approved Local Plan & WIB policies. At least a total of 20 (Adult & Dislocated Workers) randomly selected customer files will be reviewed for compliance with WIA eligibility certification and verification documentation, assessment results, Individual Employment Plan, case notes regarding services provided, documentation of WIA expenses provided and follow-up services. Customer file documentation should have evidence that all participants have been provided a copy of the Grievance procedures. The review of records should indicate that compliance with polices and procedures for nondiscrimination and equal opportunity in the development of job training plans are being followed.
5. Interviews of customers: Interviews of no less than five (5) universal customers, three (3) core B customers, and five (5) customers who have completed intensive training services will be conducted to obtain information on the quality of services provided. Customer interviews should validate that the ERC staff is in compliance with polices and procedures for non-discrimination and equal opportunity in the development of job training plans are being followed.
6. Interviews of employers: Interviews of randomly selected employers who have used the business services of the ERC within the last 12 months will be conducted to obtain information on the quality of services provided.
7. Interviews of ERC staff: Interviews of randomly selected staff at various levels of the organization will be conducted to obtain information on the administration and operations of the ERC, availability of resources required for the delivery of services and to verify that knowledge of policies and procedures for appropriate program implementation and performance outcomes is known.
8. Exit Conference: An exit conference will be held with the DWD Deputy Director and ERC Supervisor to discuss the results of the monitoring review, focusing on strengths and weaknesses of the program, identifying areas that require corrective actions and offering technical assistance for continuous improvement.

Monitoring Report

The monitoring report will identify areas of non-compliance noted as findings with recommended corrective actions. The format of the report will commence with information specific to the program monitored, date of visit, and identity of members of the monitoring team. The body of the report will consist of results regarding the following areas:

1. Fiscal Management: Evaluation of fiscal sampling, actions taken, documentation and administrative controls.
2. Program Management: Assessment process and results of the overall management of the ERC programs and systems. Included are staffing levels, organizational structure, staff qualifications, adherence to the Workforce Investment Act and San Bernardino County and WIB policies, procedures and state directives.
3. Condition of Facilities: Observations of accessibility, comfort, health and safety of the environment, including a general appraisal to determine if the accommodations are conducive for WIA activities to result in successes.
4. Program Performance: Assessment process and results of planned performance and actual performance/services provided to date, including forecasts for year end performance levels.
5. Previous Monitoring Findings: Review and status of previous findings, recommendations, and corrective actions.
6. Findings: Any areas of non-compliance with policies, procedures, state or federal regulations for WIA programs and activities.
7. Corrective Actions Required: Clearly stated corrective actions are stipulated immediately following a finding of obvious or evident violations of law, regulations or policy with set deadlines for resolution.
8. Recommendations/Technical Assistance: Include recommendations for additional training workshops, resources, etc. that can assist the ERC in resolution of findings, performance improvement or service enhancement for customers.
9. Disclaimer: As the monitoring is conducted on a sample basis, the report should not be considered a comprehensive assessment of the program factors monitored. It is the responsibility of the administration of the one-stop delivery system to ensure systems, programs, and outcomes comply with the Workforce Investment Act law and regulations, the American with Disabilities Act and all other applicable state and federal policies. Therefore, deficiencies identified in the subsequent review, such as an audit, would remain the sole responsibility of the one-stop administrator/operator.

A draft of the monitoring report will be submitted to the Contract & Performance Committee (CPC) of the WIB approximately 30 days after the monitoring review has been completed for determination if the corrective action recommended by the monitoring team is sufficient. With approval from the WIB CPC, the draft monitoring report shall be submitted to the one-stop administrator.

Monitoring Report Response

Upon receipt of the draft monitoring report the one-stop administrator has approximately 30 working days in which to respond with corrective actions taken including a timeline indicating when the corrective actions will be completed. Should the report indicate that the ERC programs and activities are in general compliance, no response is necessary.

Sufficient Response Letter

Once the one-stop administrator has submitted a response to the monitoring report, CPC, upon recommendation from the monitoring team, will review the response for sufficient corrective action. Upon determination, a letter of sufficient response will be sent to the one-stop administrator approximately 30 days of receipt from the monitoring report response. Should it be determined the response was insufficient, then an insufficient response letter will be sent with further actions to be taken and deadlines for resolution. At the direction of CPC, the response process will be repeated until the deficiencies are resolved or until CPC determines that other actions are necessary.

Follow-Up

Should the one-stop administrator fail to respond to the monitoring report or to resolve corrective actions, the WIB may determine that the One Stop Operator may fall under sanctions including, but not limited to the following:

- Request by WIB to appear and respond to findings
- Modifications or changes to the scope of work
- Termination or suspension of program operations

The monitoring team will follow-up upon receipt of the response by the one-stop administrator to ensure that the ERC has initiated appropriate corrective actions in the areas noted in the monitoring report. This may necessitate subsequent on-site visits for verification. A follow-up notice will be forwarded to the CPC for determination if the corrective action is sufficient.