



## Tulsa Area Workforce Development Board, Inc.

*Proudly serving Creek, Osage, Pawnee and Tulsa Counties in Oklahoma*

# Program Monitoring Policy

**Board Approved: 08/16/2018**

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This presentation was financed in whole or part by funds from the US Department of Labor as administered by the Oklahoma Office of Workforce Development.

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# Program Monitoring Policy Changes Overview

## Most Recent Policy Changes:

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**Board Approval:** 08.16.2018  
**Executive Committee Approval:** 08.09.2018  
**Oversight Committee Approval:** 07.30.2018

**Reason:** Updated to reflect an annual monitoring of Equal Opportunity rather than triennially, per 29 CFR 38.

### Rescinded:

- Mog-2017 Monitoring Policy Definition Change TU2017-10.27.2017
  - Monitoring Policy TU2016-062017-1
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**Board Approval:** 06 15 2017  
**Executive Committee Approval:** 06 08 2017  
**Oversight Committee Approval:** 05 22 2017  
**Youth Committee Approval:** 05 04 2017

**Reason:** This policy was updated to reflect the change reducing the comprehensive monitoring from monthly to quarterly.

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**Board Approval:** 10 20 2016  
**Executive Committee Approval:** 10 06 2016  
**Oversight Committee Approval:** 09 26 2016  
**Youth Committee Approval:** 09 16 2016

**Reason:** Provide guidance and accountability to the local area in monitoring responsibilities and expectations under the Workforce Innovation and Opportunity Act of 2014. This policy is also designed to provide the Service Provider guidance in the submission and responses to services provided to participants and monitoring reports.

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# Tulsa Area Workforce Development Board

## Program Monitoring Policy

Board Approval: 08/16/2018

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**I. Purpose:**

Provide guidance and accountability to the local area and its service provider in audit responsibilities and expectations under the Workforce Innovation and Opportunity Act of 2014.

**II. Authority:**

Workforce Innovation and Opportunity Act (WIOA) §107(d)(4) Employer Engagement, §129 Title I Youth Program, and § 121 One-Stop Delivery System; Oklahoma Office of Workforce Development Oklahoma Workforce Development Issuance #11-2017 Governor's Oversight & Monitoring Plan;

**III. Background:**

In accordance with federal and state guidance, local workforce development boards must issue policy regarding the procedures and processes of the program monitoring.

**IV. Definitions:**

**A. Area of Concern**

Potentially problematic processes that without notation or action may result in a finding at a later point. Areas of concern are primarily for technical assistance purposes to prevent violations of Federal, state, or local policy.

**B. Desk Reviews**

Reviews made during the monitoring process for the purpose of collecting and analyzing information and to support on-site reviews/monitoring. Desk reviews analyze existing data such as required monthly financial reports, vouchers, contracts, budgets, OSL data, and prior audits and monitoring reports.

**C. File Reviews**

Reviews of a sample of participant's files to determine compliance with required federal, state, and local laws, policies, and procedures.

**D. Finding**

Noncompliance with policy, guidance or requested procedural steps.

**E. Observation**

Item not addressed within written policy, guidance, or requested procedural steps, but that will need to be reviewed for procedural improvement.

**F. On-Site Reviews –**

The fundamental component of monitoring reviews, consisting of data collection techniques using formal monitoring guides. On-site reviews allows for the verification of items contained in the contract, grant agreement, or other items identified in the desk review

**V. Oklahoma Office of Workforce Development (OOWD)**

The TAWDB ensures:

- A. monitoring of service provider, including monitoring reports and resolutions, shall be submitted to OOWD on an annual basis and at least sixty (60) days prior to expiration of the service provider contract.
- B. OOWD is provided with all requested documents within the 60 day timeframe and prior to the OOWD scheduled monitoring date.
- C. appropriate staff is available at the on-site location on the monitoring date(s) to assist OOWD monitoring.

**VI. Local Policy:**

The local board, through its members, staff, and Oversight Committee, will be responsible for ensuring local oversight of WIOA Title I Adult, DLW programs and the One-Stop System, as prescribed by the Workforce Innovation and Opportunity Act and Governor’s Council for Workforce Development. Attachments within this document may be updated by board staff to reflect changes in federal, state and local policies and procedures.

To ensure compliance with federal, state and local administrative and financial requirements, the board will provide oversight regarding policies and procedures used in the local area and ensure that state and local performance goals are being achieved. The board will receive reports from the Tulsa Area Workforce Development Board (TAWDB) staff and fiscal agent on the results of all monitoring activities, and any oral or written reports generated by the TAWDB Executive Director regarding significant monitoring or compliance issues that have come to his/her attention.

**A. Board Staff Administrative Responsibilities**

The board staff, consisting of the Executive Director and Manager of Compliance will be responsible for the notification of all involved parties and ensuring that corrective actions are taken when monitoring findings or area of concerns are identified. The Executive Director will also be responsible for notifying the chairman of the board and/or board Oversight Committee immediately through written or oral notification of any situations deemed potentially serious and pressing. A timeframe will be established later in this document for the completion of corrective actions and procedures established for follow-up monitoring to ensure corrective action has been taken.

**B. Monitoring Responsibilities**

Activity	Responsible Staff	Type of Report	Distributed To
Program Monitoring	TAWDB Manager of Compliance	<ul style="list-style-type: none"> <li>○ Monitoring/Oversight</li> <li>○ Written</li> <li>○ Quarterly</li> </ul>	<ul style="list-style-type: none"> <li>○ Service Provider</li> <li>○ TAWDB Executive Director</li> <li>○ TAWDB Oversight Committee</li> </ul>
System Monitoring	<ul style="list-style-type: none"> <li>○ TAWDB Executive Director and</li> <li>○ TAWDB Manager of Compliance</li> </ul>	<ul style="list-style-type: none"> <li>○ Monitoring,</li> <li>○ Written Summary</li> <li>○ Oral</li> </ul>	<ul style="list-style-type: none"> <li>○ Service Provider</li> <li>○ Center Managers</li> <li>○ TAWDB Executive Director</li> <li>○ TAWDB Chairman of the Board</li> <li>○ TAWDB Board, as appropriate</li> <li>○ Chief Local Elected Official, as appropriate</li> </ul>

**C. Scope and Frequency of Monitoring**

Dates listed below are subject to staff availability. At a minimum, monitoring will be completed once throughout the Program Year.

Monitoring Calendar			
Type of Monitoring	Period	Dates of Monitoring	Report Due
System Delivery	Annually	Jan 3 - Feb 25	April 30
Contract Performance	1st Quarter - July-Sept	Nov 1 - Nov 30	Nov 30
	2nd Quarter - Oct-Dec	Feb 1 - Feb 28	Feb 28
	3rd Quarter - Jan-Mar	May 1- May31	May 31
	4th Quarter - Apr-Jun	Aug 1- Aug 31	Aug 31
Comprehensive	Quarterly Monitor	<i>Of the following month...</i>	
<b>Adult/DLW</b>	5% of new enrollments	<i>Correlates with Contract Performance</i>	<i>Correlates with Contract Performance</i>
<b>Youth</b>	5% of new enrollments	<i>Correlates with Contract Performance</i>	<i>Correlates with Contract Performance</i>
On-The-Job & Work Experience (WEX) Contract, except SYEP WEX	Continuous	As Needed	May 31

**System Delivery**

<b>Equal Opportunity (EO)</b>	Ensure regulations are being followed in all workforce centers. This monitoring will coincide with the state annual equal opportunity monitoring.	Annually
<b>System Integration</b>	Review partners and their involvement in the workforce system in relevance to local partner Memorandum of Understanding(s).	Triennially
<b>Policy Compliance Alignment</b>	Ensure LWDBs polices align with state and federal regulations Ensure service provider procedures align with LWDB policy and procedures.	Annually

- All Service Provider policy, procedures, plans and changes to any to the previously listed, must be submitted to the TAWDB Executive Director and Manager of Compliance for approval.
- All One-Stop Operator or Center policy, procedures, plans, and changes to any of the listed above, must be submitted to the TAWDB Executive Director and Manager of Compliance for approval.

**Program Performance**

<b>Contract Performance Measures</b>	Ensure Service Provider is meeting the measures outlined in Service Provider contract.	Quarterly
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Quarterly reports must be:

- Provided in the format found in Attachment A Summary Tab, unless otherwise communicated in writing by Board Staff.

**Program Monitoring, continued**

- Provided via email no later than the second full week Friday after the end of the Quarter. Quarter 1 July – September 2016 report due: August 12, 2016
  - The service provider will provide a monthly update on the service provider contract performance. This report will be due the second full week Friday of the following month.
- The document should have the program year, month report name, then file name. (i.e. 2016 07 Service Provider Contract Performance - for July 2016).
- Customer Satisfaction Survey
  - must be at least a 5% response from those who were contacted. Those whose emails are undeliverable or "bounce back" are excluded from the denominator.

If the result of the quarterly contract performance monitoring reflects the service provider did not meet contract incentive numbers, then the appropriate dollar amount will be reimbursed to the LWDB, through the Fiscal Agent.

<b>Performance Indicators</b>	Ensure the service provider is meeting all state performance expectations.	Quarterly
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- The Service Provider will provide a monthly update on the State Performance Indicators. This report will be due the second full week Friday of the following month.
- The document should have the program year, month report name, then file name. (i.e. 2016-07 State Performance Indicator Report, for July 2016.)

<b>Any other Grants</b>	Ensure the Service Provider is meeting all performance expectations.	Quarterly
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- The Service Provider will provide a monthly update on the specific Grant Performance Indicators. This report will be due the second full week Friday of the following month.
- The document should have the program year, month report name, then file name. (i.e. 2016-07 State Performance Indicator Report, for July 2016.)

**Comprehensive**

Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment and individual employment plan and/or individual service strategy and other items.

<b>Adult &amp; Dislocated Worker</b>	A minimum 5% of new enrollments shall be monitored.	Quarterly
<b>Youth</b>	At a minimum 5% of new enrollments shall be monitored.	Quarterly

<b><u>On-The Job training (OJT)</u></b> Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, OJT contracts, worksite monitoring and other items.	As Needed
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- Information must be provided in the format found in Attachment B unless otherwise communicated in writing by board staff. The spreadsheet should have file name, program year, month and day in the file name. ( i.e. 2016

SYEP 07 01 2016, for July 1, 2016)

- Attachment C must be provided via email not later than 3 business days after the On-The-Job contract has begun and copy of contract uploaded to the state data system as outlined in policy.
- Any update of the Attachment C will follow these steps:
  - Update the spreadsheet with the appropriate information in a different color text than what is found in the document. If text is in black, then use red or a bright color. Use color that is not close the one already being used.
  - Save the document as a revision by adding "R" plus the appropriate number that reflects the amount of times the document has been revised (1), then add date of revision (i.e. PY15-PY16 SYEP 07 01 2016 R1 07 25 2016). If another revision is needed, make all text within the document black then put changes in a different color and replace the R1 07 25 2016 with current information R2 and date of revision (i.e. PY15-PY16 SYEP 07 01 2016 R2 08 31 2016).

<p><b>Work Experience</b> Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, WEX contracts, worksite monitoring and other items.</p>	As Needed
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- Information must be provided in the format found in Attachment C, unless otherwise communicated by board staff. The spreadsheet should have file name, program year, month and day in the file name.( i.e. PY16 SYEP 07 01 2016, for July 1, 2016)
- Attachment D must be provided via email no later than 3 business days after Work Experience (WEX) contract has begun, accompanied by the WEX contract being uploaded within the 3 business day timeframe
  - These are items that need to be uploaded
    - Work Site Agreement
    - Trainee Plan
    - I-9 and W-4 Forms
    - Work Experience Orientation
    - Supervisor Orientation
- Any update of the Attachment D will follow these steps:
  - Update the spreadsheet with the appropriate information in a different color text than what is found in the document. If text is in black, then use red or a bright color. Use color that is similar to the one already being used.
  - Save the document as a revision by adding "R" plus the appropriate number that reflects the number of times the document has been revised (1), then add date of revision (i.e. PY15-PY16 SYEP 07 01 2016 R1 07 25 2016). If another revision is needed, be sure to make all text within the document black then put changes in a different color and replace the R1 07 25 2016 with the current numbers R2 and date of revision (i.e. PY15-PY16 SYEP 07 01 2016 R2 08 31 2016).

**D. Reporting:**

1. As **systematic monitoring** is completed, observations, area of concerns, or findings identified by the TAWDB Manager of Compliance will be reported to the appropriate department heads (i.e. Service Provider, Executive Director, integrated and non-integrated center managers, TAWDB Chairman of the Board, etc.), within the workforce system/center, through a written summary or oral report, as appropriate. The written report may be accomplished through letter, standardized monitoring form or e-mail. Observations will not require a response; however, findings would necessitate a response from the appropriate party within 14 calendar days. The TAWDB Manager of Compliance will then review proposed corrective actions to ensure that proposed actions have been implemented. In the case of possible disallowed costs, the TAWDB Manager of Compliance will notify the TAWDB Executive Director immediately. The TAWDB Oversight

Committee will receive a summary report from the TAWDB Manager of Compliance at each committee meeting outlining the monitoring activities and any potential liabilities reviewed.

2. As **programmatic monitoring** is completed, the TAWDB Manager of Compliance will issue a monitoring report to the Service Provider for any deficiencies found for that monitoring activity. If no deficiencies are found a letter shall be provided to the Service Provider addressing the criteria monitored and that no issues were found. If issue are found the Service Provider will have 14 calendar days to issue a corrective action and/or response to any monitoring report issued. The monitor will then review corrective actions to ensure proposed action has been implemented.

**E. Corrective Actions**

An Official Report shall be provided to the appropriate party upon completion. Those receiving the report from Board Staff shall have 14 calendar days to respond. Observations will not require a response; however areas of concern and findings would necessitate a response from the appropriate party. The appropriate party shall have 2 attempts to address all issues found with the report or have a plan in place for a resolution that has been approved by the TAWDB Executive Director. Further responses may be allowed at the discretion of the TAWDB Executive Director. If parties reach an impasse and are not able to resolve an issue, the TAWDB determination shall stand and the service provider has the option to submit a grievance through the TAWDB Grievance Policy.

The TAWDB Manager of Compliance shall conduct follow-up monitoring on those deficiencies which have been addressed in the monitoring report within a reasonable amount of time, to ensure that proper corrective actions have been taken.

**F. Support Documentation**

Support documentation may be requested from the Service Provider from time to time to validate responses to correct actions. In providing the support documentation each supporting document shall have the issue number identified on the report and the appropriate participant identification number of the participant for which the documentation is referencing.

**G. Technical Assistance**

Any TAWDB Service Provider or One-Stop Partner may request technical assistance from the TAWDB by making a request in writing to the TAWDB Executive Director or TAWDB Manager of Compliance. The request should describe the type of assistance requested. The TAWDB Executive Director or TAWDB Manager of Compliance will reply to any such request after considering the TAWDB's priorities and available resources.

In addition, the TAWDB, Service Providers, CLEOs, or fiscal agents may request technical assistance from the OOWD in order to ensure compliance with federal or state regulations. All communications from the TAWDB contracted Service Provider to the State Agency must include the Manager of Compliance.

**VII. ATTACHMENTS:**

- Attachment A** TEMPLATE CONTRACT PERFORMANCE QUARTER MONITORING REPORT
- Attachment B** TEMPLATE ON THE JOB TRAINING SPREADSHEET
- Attachment C** TEMPLATE WORK EXPERIENCE SPREADSHEET
- Attachment D** TEMPLATE CUSTOMER SERVICE SATISFACTION QUARTER DATA REPORT



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PY 15 Quarter 3 Adult & Dislocated Worker Summary			
M-1 IEP 652	M-2 Attainment 76	M-3 CRC 218	M-4 Hard to Serve 120
68029	68029	74221	75352
69773	110732	75352	76808
71158	169918	82745	80885
74221	232518	104164	128493
75050	270372	120314	153910

PY 15 Quarter 3 Youth Program Summary			
M-1 ISS 229	M-2 Hard to Serve 100	M-3 CRC 50	M-4 WEX 43
668444	668444	847842	1002087
769208	769208	955988	1025911
819449	819449	965082	1097707
825574	825574	968941	1099215
837604	848003	972668	1105940







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Customer Satisfaction Quarter Data

**Adult**

	# of participants who received IEP/ISS in Quarter	# of who the survey was sent to	# of bounce backs on emails
Q1			
Q2			
Q3			
Q4			

**Youth**

	# of participants who received IEP/ISS in Quarter	# of who the survey was sent to	# of bounce backs on emails
Q1			
Q2			
Q3			
Q4			