



TITLE: Southern Indiana Works Monitoring Policy

ISSUE DATE: June 1, 2006

EFFECTIVE DATE: July 1, 2006

REVISED DATE: July 1, 2017 (Updated for WIOA)

Purpose

The Indiana Department of Workforce Development has issued policy regarding monitoring for WIOA sub-recipients. The purpose of this policy is to communicate Federal and State regulations regarding the monitoring process through appropriate local levels for all WIOA sub-recipients. Additionally, this policy has incorporated local guidance, where appropriate for standardized implementation.

Required Action

Workforce Innovation and Opportunity Act Title I Program Providers and all other appropriate Southern Indiana Works staff must adhere to the policies outlined herein.

Background

The Chief Elected Official is the grant recipient of the Workforce Innovation and Opportunity Act (Title I) funds for Region 10. Southern Indiana Works is required to comply and enforce Federal Regulations and DWD policies for the Workforce Service System.

Introduction

The Southern Indiana Works Chief Elected Official is the grant recipient of Workforce Investment (Title I) funding on behalf of Southern Indiana Works. Southern Indiana Works is responsible for oversight of Workforce Innovation and Opportunity Act funded services and programs. The Board is obligated to provide oversight activities and perform monitoring functions for the administration of such funds granted by the Indiana Department of Workforce Development. This oversight responsibility includes reviewing, monitoring and evaluation.

Specifically the Southern Indiana Works Service Area oversight responsibilities include:

1. Compliance with applicable state and federal laws and regulations and monitoring priority areas such as procurement, fiscal and on-the-job training programs.
 2. Ensure expenditures have been made against cost categories and within cost limitations specified in the ACT and regulations.
 3. Evaluating contractor performance.
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4. Provide technical assistance as necessary and appropriate.

The Board intends to provide on-site monitoring of all service providers, (excluding ITA vendors), individual on-the-job training contractors, and work experience sites to occur at least annually or once during the term of the agreement if it lasts less than one year, for financial and operational compliance. The Fiscal Agent will be responsible for financial monitoring, activities. The Board will conduct programmatic monitoring to ensure compliance with WIOA federal, state and local regulations and other laws, and provide technical assistance where appropriate.

Note: Southern Indiana Works does not permit any program or administrative files or file documents to be removed from the premises of the WIOA Program Administrative Office for review, monitoring or audit of any program. All reviews or monitoring must be conducted on-site, without exception, with staff present on-site to assist as appropriate.

The Board will review all on-the-job training contracts, and customized training contracts. On-the-job training and customized training must be monitored on-site at-least once during the term of the agreement, and once during the six month period following completion of the contract.

Identification and Scope of Monitoring

Subcontractors will be subject to oversight and monitoring of all program/contract requirements. This will include a programmatic overview, and file monitoring to determine compliance with federal, state and local policies. One-the-job training and customized training contracts will be reviewed. If a service provider receives multiple findings in the internal and/or agency monitoring process, the board will conduct a follow-up monitoring process within three months.

WIOA sub-recipients will be monitored once annually, and monitoring entities will review contracts providing client services within the WorkOne System once per program year. For sub-recipients, under which a contract is one-year or less, monitoring will be conducted once during the contract period. Monitoring procedures will incorporate operational compliance components.

On-the-Job Training/Customized Training

Service providers will be responsible for monitoring on-the-job training and customized training programs. Monthly check-ins are required throughout the contractual period, and on-site monitoring is to be conducted at-least once during the contract period (once during the contract, and once within six months following completion of the OJT Contract. Sub recipients must include the following elements within the scope of monitoring OJT and customized training programs:

- Progress of clients
 - Placements as determined within the OJT and customized training contract
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- Retention as determined within the OJT and customized training contract

A standard monitoring form may be required.

Monitoring will be conducted on participant files in which the participant engages in an OJT or customized training program.

Monitoring Guide

Initial monitoring will be conducted using the guidelines of the contract between the Board and the service provider, utilizing the statement of work as provided by the service provider and incorporated into the contract. The service provider will be held accountable to the terms and conditions within the contract, including all program modifications.

A monitoring guide may be developed as an oversight tool used to gain a better understanding of the subcontractor's project processes. In the event that a monitoring guide is developed, it will be shared with the service provider within 24 hours of the scheduled on-site monitoring. The monitoring guide may be subject to change corresponding with legislative or policy modifications from the federal, state or local level. When available, monitoring materials developed by Indiana Workforce Development's Oversight Unit may be utilized in the monitoring process.

On-site Monitoring

Program monitoring will be conducted once each program year, or at-least once during the term of the contract. Exited file may be reviewed on an on-going basis as the exit occurs, and a thorough review of files that are near to possible exit (within 75 days of the 90-day exit rule). All negative exits may require an in-depth analysis as to the cause for the negative exit towards performance.

Monitoring of High Risk Service Providers

A determination may be made that the service provider exhibits high risk where:

- Monitoring activities exhibit significant findings or findings are deemed repetitive in nature
- Monitoring activities exhibit findings that result in disallowed costs exceeding \$5,000
- Service provider fails to obtain a minimum of 3 of 4 WIOA performance measures, or 2 of 3 common performance measures
- Negative public relations and/or published scandals that have come to the attention of the board may negatively impact program or contract performance
- Recommendation by the Indiana Department of Workforce Development or U.S. Dept. of Labor
- Additional criteria may be established for data validation pending complete integration with TrackOne data management systems.

If the board determines through the internal and/or agency monitoring process that the service provider exhibits high-risk, due to significant findings in any review process, and/or failure to follow compliance procedures, a follow-up monitoring review will be conducted

within three months of the monitoring report. If the service provider fails to improve, and continues to exhibit deficiencies in the follow-up review, then the provider will be notified of probationary status and will be monitored monthly or quarterly thereafter for a term not-to-exceed six months. Service providers who do not exhibit significant improvement may be recommended for cancellation.

Monitoring Reports

As a result of the analysis of the data gathered from the monitoring process, a Monitoring Report will be generated. Generally the Monitoring Report will contain:

- a. A review of the monitoring objectives;
- b. A brief description, including dates, of the monitoring activities and a listing of the data sources;
- c. Identification of any significant findings, either positive or negative;
- d. Conclusions identified, noting how the analysis of data led to such conclusions;
- e. Recommendations including any corrective actions, which may be necessary.

Corrective actions are noted whenever it is determined that the contractor has deficiencies or problems. The Monitoring Report's recommendations for corrective action will identify what action is necessary/required and the schedule/time frames for implementation. Additionally, the report may indicate a follow-up monitoring activity as well as any recommendations concerning future contracting.

- Reference **Attachment A** for sample OJT monitoring template.

Report Formats/Time Frames

A Preliminary Monitoring Reports will be provided upon completion of the annual monitoring activity/process. Monitoring staff will prepare a written report and may provide an on-site conference and offer Technical Assistance if necessary. Service Providers have a specified period (generally 30-45 days) to provide any clarifications or information, which could alter or amend the conclusions and recommendations of the preliminary report. The monitoring entity will review these clarifications and issue a final Monitoring Report to the board upon receipt of such clarifications from Service Providers.

Documentation of Findings Procedure

Participant files are reviewed to ensure that appropriate documentation, as mandated by the Federal and State regulations, is adequately noted in the file as it relates to eligibility, provision of services, and supportive and training expenditures. Monitoring of OJT contracts and follow-up with OJT participants must be documented in service records.

When a finding is noted, it is the responsibility of the service provider to supply the monitoring entity with appropriate documentation to resolve the finding. Eligibility guidelines have been provided as local policy that defines the documentation required. Questions regarding local policy, or for clarification, should be addressed to the Board contact on the policy.

Resolution Procedures/Time Frame

The service provider will be provided with the opportunity to respond to all compliance/finding, observation issues, and questioned costs within 30 days from the date of when the report was issued. Responses should be submitted in narrative format, with a description of each issue being addressed, and its proposed resolution. Supporting documentation to correct the compliance/finding must be included with the narrative response.

The monitoring entity will review the submission and attached documentation and will issue a response to resolution, identify additional actions to be taken, or both. A resolution means that an issue has met the satisfaction of the monitoring entity on behalf of the board, and is no longer in question or determined out of compliance. Where additional actions are required, the issue in question has not met the requirements of the monitoring entity/board and remains questioned or deemed out of compliance.

Indiana State Department of Workforce Development Monitoring

The Indiana Department of Workforce Development will monitor the program and fiscal activities of the Workforce Service Area in accordance with their calendar schedule provided by Indiana Dept. of Workforce Development.

Department of Labor Monitoring

It is always to be anticipated that DOL may monitor during the program year. However, a schedule of this monitoring activity is not available.

Staff Training

Staff training occurs on an ongoing basis, and as training opportunities are made available:

1. IndianaCareerConnect specific training (ICC Tutorial and other staff reporting activities, including WIOA rules/program policy) will be conducted with all new program staff for new case management system, and periodically as deemed necessary.
2. Provider and Board staff attends meetings coordinated by Indiana Workforce Development periodically to share information and cross-train with peers.
3. Program provider staff and Board staff will attend additional training specific to Workforce Innovation and Opportunity Act performance management, case management, and other Workforce Innovation and Opportunity Act technical assistance programs as made available through the Dept. of Workforce Development.
4. Service provision guidance will be provided ongoing through written, verbal, directives, and team-meeting approaches on a variety of policy, performance, and case management issues.
5. Other training may be scheduled periodically throughout the program year, as needed.

Additional Information

Questions regarding the content of this publication should be directed to the Operations Manager, Jacqueline James at (812) 941-6422 or jjames@workoneregion10.com.

Attachment A
SAMPLE OJT Monitoring Template

Employer Name: _____

OJT Contract#: _____

OJT Participant Name: _____

OJT Participant SSN: XXX-XX- _____

Monitor's Name: _____

Date of Visit: _____

Records and Accounts

Question	Answer	Findings/Issues (if any)
1. Does the employer have timesheets or payroll registers for the OJT participant and do these documents support the hours claimed on the most recent invoice?	Yes No	
2. Is the OJT participant receiving the wage identified in the OJT contract and on the most recent invoice?	Yes No	
3. Is the OJT participant receiving the same wage as other workers in the same position?	Yes No	

Training Activities

Question	Answer	Findings/Issues (if any)
4. Is the OJT participant receiving the training that was detailed in the OJT Training Plan?	Yes No	
5. Is the OJT participant working and receiving training	Yes	

in a safe and healthy work environment?	No	
6. Is the OJT participant receiving appropriate direction and supervision on the worksite?	Yes	
	No	

OJT Progress Check

Question	Answer	Findings/Issues (if any)
7. From the OJT participant's perspective, do they feel they are doing well and learning the required job tasks?	Yes No	
8. From the employer's perspective, do they feel that the OJT participant is doing well and learning the required job tasks?	Yes No	
9. Are there any issues which may cause this OJT to be unsuccessful?	Yes No	

Overall Evaluation

Briefly describe what was observed and learned while conducting the OJT monitoring visit.

Detail any needed corrective actions to address the findings and issues identified in the above questions.

Monitor's Signature: _____

Date of Signature: _____

Date of Follow-Up Visit if Needed: _____