

**NEMO WIB
WIA Title I-B
Substate Monitoring Plan**

PRE-MONITORING ACTIVITIES

Monitoring Scheduling

All subcontractors shall be monitored by staff of the NEMO Workforce Investment Board for each program they operate, at least annually. The Monitoring schedule and sample size will be in accordance with DWD Issuance 15-2010 Sub-State Monitoring policy. The Subcontractor shall be notified of the intended dates of scheduled monitoring at least two weeks prior to the date of the visit whenever possible. The NEMO WIB reserves the right to conduct unscheduled monitoring in conjunction with or in response to investigations of misfeasance and/or malfeasance or previous monitoring findings.

Programmatic and Operational Monitoring will be conducted that effectively measures compliance with WIA regulations and DWD Policies including all of the NGCC policies. Monitoring will include a comprehensive examination of compliance issues cited in prior State and Region reviews and the determination where corrective measures were taken to address and resolve those issues.

Sample Size

A random sampling of files from every funding stream will be selected to test eligibility. WIA Adult and Dislocated Worker records/enrollments will be combined for the purpose of sampling NGCC service delivery. A sampling of core-only enrollments will be conducted. In addition, a combined sampling of records/files of Adult and Dislocated Workers participants enrolled in any of the following services:

- Classroom Training
- On-the-Job Training
- Work Experience/Internship
- Support Services/Needs-related payments
- Any other service that results in direct payment being made to, or on behalf of, a participant

The following sample sizes are required, at a minimum, depending on the universe to be reviewed. These guidelines are applicable for every sample to be reviewed i.e., a sampling will be selected from the universe sample size listed below for Classroom Training, On-the-Job training, Work Experience/Internship, Support Services/Needs-Related payments and any other service that results in direct payment being made to, or on behalf of, a participant.

Universal Sampling Size		
From	To	# of Files to review
1	200	51
201	300	55
301	400	58
401	500	60
501	1,000	63
1,001	2,000	65
2,001	10,000	67

Universe Sampling Size

This table is based on random sampling for attributes when the expected rate of occurrence is not over (20) percent with a confidence level of ninety (90) percent, plus or minus eight (8) percent.

Pre-Monitoring Desk Top Review

Prior to the beginning of the monitoring visit, monitoring staff may review records by desk top. A random sampling of items may be reviewed during the monitoring. Those items will include but not be limited to:

1. subcontractors contract scope of work;
2. subcontractors planned performance levels (as applicable);
3. case management system information relating actual performance;
4. contract progress reports to determine actual expenditures;
5. Toolbox record data

ON-SITE ACTIVITIES

Entrance Conference

Upon arrival at the subcontractor's primary office, the lead person of the monitoring team shall hold an Entrance Conference with the WIA Title I-B Operator and/or Designated One-Stop Operator of the Career Center being monitored or his/her representative. The lead monitor shall outline the monitoring activities to be conducted and the WIB personnel will be responsible for each activity. The schedule for visiting work-sites and/or training sites will be planned. Monitors will answer any questions that the ~~program~~ subcontractor and/or one-stop operator staff may have relating to the monitoring.

One-Stop Operator Staff Interview

The NEMO Workforce Investment Board has designated the Functional Leaders as the One-Stop Operator. As the One-Stop Operator the Functional Leader shall be interviewed at least once during each program year. A standardized form will be used so that Functional Leaders can conduct a Career Center self evaluation. The questionnaire is designed to allow Functional leaders to create and evaluate progress with NGCC process and procedures, evaluate minimum standards and the effectiveness of the processes. The WIB will use their responses for improvements and to identify skills/service gaps.

Monitoring process will include questionnaires and procedures for interviewing customers, employers, trainers and Career Center staff. However at a minimum, the interview will inquire about the following processes and systems:

1. General management of the career center; including facility and maintenance responsibilities
2. Coordination of services
3. Continuous improvement
4. LMI system and data
5. Availability of resources
6. Performance and outcome measures, including customer satisfaction
7. Record keeping and reporting, including participant tracking
8. Appropriateness of Adults and Dislocated Workers in Need of Intensive and Training Services
9. Next Generation Career Center (NGCC) services and model system
10. Orientation to services to include participant rights under complaint and grievance procedures
11. Implementation of NGCC minimum standards
12. NGCC Membership/Assessment
13. Labor Exchange
14. NGCC Products and Service Usage to include workshops
 - WIA Adult and Dislocated Worker
 - Classroom training
 - On the Job Training
 - Short Term pre-vocational services
 - Support Services
15. WIA Youth

16. EO Observation

Personnel Systems

The NEMO Workforce Investment Board monitoring staff may review one or more personnel records of individuals paid through contracts with the NEMO WIB. The purpose of this review shall be to ascertain if subcontractor staff:

1. Possess the education and experience noted in proposals submitted to the WIB;
2. Expend the time on contract related activities charged against the contracts being monitored;
3. Have documentation of capacity building efforts on their behalf; and
4. Have signed complaint and grievance procedures on file.

Confidential information, such as disciplinary action and service reports are not considered relevant to normal monitoring and should be stored in a closed envelop within the personnel file.

EEO and ADA Compliance

NEMO WIB monitoring staff shall survey the subcontractor's hiring practices, promotion practices, facilities, and outreach and intake procedures to ascertain if the subcontractor is in compliance with the Equal Employment Opportunities and the Americans with Disabilities Acts.

Financial Procedures Review

At least once during each program year, the WIB financial monitoring staff shall review each program operator's financial procedures and systems to ensure fiscal integrity and compliance with Section 184(a)(4) of the WIA and Title 29 Part 95 (Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations) or Title 29 Part 97 (State and Local Governments). In addition, funds intended to support adult, dislocated worker, youth, Next Generation Career Centers (NGCC), stand-alone summer youth programs or any other special initiatives will be monitored in accordance with contractual scopes of work. The monitoring shall be completed using a standardized monitoring instrument, which may be customized to meet special contract provisions of individual subcontractors. This review shall include a sampling, covering at least one month's activities, and shall consist of the following procedures:

1. tracing reports to books (contract progress reports to original books);
2. a computation of excess cash and review cash for interest earned on advances;
3. a review of trial balances and bank reconciliations;
4. an examination to assure that FDIC coverage and collateral security are adequate for cash on hand;
5. an examination of inventory records;
6. a review of bonding policy;
7. a check on internal controls and separation of duties;
8. an examination to determine if program income exists, is being accounted for and reported in accordance with applicable requirements;
9. a review and interview to ensure that staff is following the proper guide for determining costs applicable to WIA (OMB Circular) and WIA procurement guidelines;
10. a review of the cost allocation system;
11. a regular examination of expenditures to test transactions against cost categories, cost limitations, and;
12. a review and certification that the procurement process is in compliance with the WIA procurement system guidelines;
13. determination if stand-in costs exist and are being accounted for; and
14. a review of records to ensure proper source documents exist.

The monitoring will result in a written monitoring report, subject to review and approval by higher authority, other than the monitor. Any findings will result in required corrective action plans submitted to the Administrative Entity within 30 days after the program operator receives the written monitoring report from the Monitoring and Continuous Improvement Committee, and correction satisfactorily implemented within one year of the finding. Subsequent monitoring will review prior financial monitor reports and investigate any prior findings and their resolution.

Participant File Review

At a minimum, participant records are to be reviewed for the following:

- Documentation of participant eligibility and/or priority for the program and services received
- Orientation to services
- Orientation of the participant to his/her rights under complaint and grievance procedures
- Justification for the provision of Intensive or Training services
- Method of assessment
- Employment planning
- Individual Training Accounts
- Appropriateness and accuracy of participant payments (support service and needs related)
- Appropriate date entry and posting of outcomes, including attainment of a degree or certificate and any supplemental employment data

Subsidized Worksite-Training Site Reviews

During each monitoring visit, a representative sampling of active or recently active work and/or training sites will be visited. The sampling shall, whenever possible, represent all of the activities in which participants have been served. Employers, supervisors and/or instructors will be interviewed using the appropriate form. The monitor will also use these forms to review health and safety standards at the work/training site and to make such other comments as may be relevant to the site review.

Participant Interviews

During each work and/or training site review, a sample of participants will be interviewed as well. A sampling of participants should be interviewed at each site where one or more participants are present. Scheduling of such interviews should, whenever possible, take into consideration the needs and convenience of the worksite, employer and/or educational institution.

Exit Conference

Upon completion of the on-site monitoring activities, the lead monitor and/or monitoring team will conduct an Exit Conference for the WIA Title I-B Operator and/or Designated One-Stop Operator of the Career Center being monitored or his/her representative. At the discretion of the lead monitor, information, which may identify specific individuals who have been interviewed and who have made accusations of mismanagement, misfeasance or malfeasance, may be withheld pending an in-depth investigation of the accusations.

The Exit Conference shall inform the agency of the areas which were covered during the monitoring, monitoring findings and (if formulated) recommendations relating to the findings. If disallowable costs have been identified, the subcontractor will be made aware of them during the Exit Conference.

POST-MONITORING ACTIVITIES

Monitoring Report

The monitoring team shall produce a written monitoring report for each subcontractor, which will outline at a minimum:

- ◆ the activities which were monitored;
- ◆ the systems which were monitored;
- ◆ individual participant files which were found to contain errors;
- ◆ Adequacy of assessment
- ◆ Planning of Activities and services
- ◆ Coordination with One-Stop system partners to meet the comprehensive needs of customers
- ◆ Customer outcomes
- ◆ *a summary of the outcomes from the worksites and training sites which were visited;*
- ◆ *summary of centers progress towards integrating the NGCC model;*
- ◆ monitoring findings; and
- ◆ recommended corrective action
- ◆ regional and subcontractor performance

As this report will be considered a public document, names of participants will not appear in the report. The monitoring report shall be reviewed and approved by the Executive Director of the NEMO Workforce Investment Board. The Executive Director will prepare a cover letter to the subcontractor, which will indicate whether or not the subcontractor is to respond to the monitoring report. Any findings will result in required corrective action plans submitted to the Administrative Entity within 30 days after the subcontractor receives the written monitoring report. Copies of the monitoring report and the cover letter will be sent simultaneously to the subcontractor and to members of the Monitoring and Continuous Improvement Committee. If the subcontractor's responses are unacceptable the WIB will respond within 30 days. The subcontractor will have 10 days to respond to this second request. Monitoring reports will be provided to the WIB and CLEOS on an annual basis.

Response to Monitoring Reports

When subcontractor responses are received by the Administrative Entity, they will be reviewed and a memorandum to the Monitoring and Continuous Improvement Committee will be prepared outlining any questions, comments or further recommendations which NEMO Workforce Investment Board staff may have. The Executive Director will review the memorandum and sign it and forward it and the subcontractor's responses to the Monitoring and Continuous Improvement Committee.

Monitoring and Continuous Improvement Committee Action

The Monitoring and Continuous Improvement Committee will review the monitoring report, the subcontractors response and the Administrative Entity memorandum and may:

- Accept the subcontractors response
- Reject all or part of the response and/or require resubmission of the response
- Require additional corrective action, or
- Recommend the institution of sanctions against the subcontractor to the NEMO WIB.

When, in the opinion of the Monitoring and Continuous Improvement Committee, all the monitoring findings are satisfied, the Committee shall request that a summary of the monitoring report be prepared by the NEMO WIB staff for presentation to the NEMO WIB. A recommendation that further monitoring activities be suspended for the program year in question, pending receipt of any additional information which might call for reactivation of monitoring, will also be submitted to the WIB.

NEMO WIB Action

The NEMO WIB may accept or reject the summary monitoring report, or may request additional information regarding all or part of the report. When the NEMO WIB is satisfied that the process has been satisfactorily completed, they will either accept the original, amended or substitute summary report, and move suspension of monitoring.

If the Monitoring and Continuous Improvement Committee recommends sanction to the NEMO WIB, the WIB shall take up the recommendation at the next scheduled WIB meeting or the Chairperson may call a special meeting of the WIB to consider the recommendation.

One-Stop Committee Action

The One-Stop Committee shall also receive a summary of the final monitoring reports. The Committee may want to consider this information when reviewing eligibility for and recommending the selection of Title I subcontractors, One-Stop Operators and operators of other programs assigned to the Board, with the full WIB and CEO's.