Cape Fear Local Policy No. P-WDB-012-2018

Subject: CFWDB Oversight and Review Policy

Purpose: The purpose of the Workforce Innovation and Opportunity Act (WIOA) monitoring is to ensure the integrity of the WIOA system, to review performance, assess compliance with applicable laws and regulations, and identify successful methods and practices that serve to enhance the system through continuous improvement.

Policy: The Cape Fear Workforce Development Board (CFWDB) monitors the WIOA program and its contractors as an ongoing process through desk file reviews, monthly reimbursement requests, correspondence, and on-site visits. Additionally, at a minimum, a comprehensive review of the entire program is administered by the CFWDB on an annual basis. All programmatic and fiscal functions of the program are thoroughly reviewed for accuracy and compliance with the Department of Workforce Solutions (DWS) regulations.

Action: Monitoring Scope
The scope of the monitoring effort includes all aspects of the WIOA system. Accordingly, monitoring will be carried out both externally (contractors) and internally (Workforce Development Board and staff).

Staff Responsible for Monitoring
CFWDB staff annually administer the comprehensive monitoring of contractors. Throughout the year, CFWDB staff constantly monitors and reviews contractor performance and fiscal responsibility of the programs. The results of the monitoring reviews are reported directly to the WIOA Director, who reviews each monitoring report prior to the report being forwarded to the entity or agency which was monitored. Financial monitoring is carried out by the Fiscal Compliance Officer or others designated by the WIOA Director.

Programmatic Monitoring
Programmatic Monitoring of One-Stop Operators and Service Providers is administered by CFWDB staff members as authorized by the WIOA Director. Programmatic monitoring includes review of all programs and activities, including but not limited to the following:

1. Case note and file reviews for accuracy
2. NCWorks Online documentation reviews
3. Data validation
4. Performance
5. Equal Opportunity
6. Records and file retention
7. Eligibility
8. Interview of contractors' staff and trainees
Financial Monitoring
Financial monitoring of service providers is administered by the Fiscal Compliance Officer or other CDFWD staff member authorized by the WIOA Director. Fiscal monitoring includes extensive review of all financial aspects of the programs, including but not limited to:

1. Financial procedures
2. Salaries of staff and participants, including travel and review of timesheets
3. Individual Training Accounts and On-The Job Work Experience
4. Property management and inventory
5. Budget analysis
6. Chart of Accounts, General Ledger, Bank Reconciliations
7. Monthly financial reports and invoices

Monitoring Methods
Monitoring may be on or off site and include the following:
1. Desk reviews of program files, reports, and statistics for performance and compliance
2. On-site visits to review records and interview contractor staff and trainees for compliance and quality of service
3. Telephone calls/surveys to employers and current/former trainees to determine compliance and assess quality of service
4. Any other methods as specified by the CFWDB or WIOA Director

Effective Date: April 25, 2018
Expiration Date: Indefinite
Contact: Cape Fear Workforce Development Board Director
Distribution: CFWDB WIOA Providers
CFWDB Staff
NC Division of Workforce Solutions

Attachments: 
Attachment A: F-WDB-020-2018 Program Monitoring Review Checklist
Attachment B: F-WDB-019-2018 Fiscal Monitoring Review Checklist
ATTACHMENT

“A”
Cape Fear Local Area WIOA Title I Contractor
Internal Monitoring Checklist

All contractors operating WIOA programs funded by the Cape Fear Local Area Workforce Development Board must ensure that a system of continuous internal monitoring exists to determine proper programmatic management including review of program goals and objectives, and performance. Internal monitoring must include reviewing NCWorks Online activities, documentation of quarterly reviews of OJT Employers, WEX, and Classroom visitations, as well as a participant file reviews. Any issues resulting in non-compliance must be documented and a corrective action procedure specified to correct the deficiency.

Quality programmatic monitoring requires both internal and external monitoring to ensure compliance. Your internal monitoring documentation should include but not be limited to the following:

- Uniform compliance with WIOA regulations
- Compliance with CFLA policies and procedures
- Proper documentation of Services in NCWorks Online
- Review of documents scanned/redacted into NCWorks Online
- Review of sign-in and participant tracking systems
- Staff interviews to ensure that a program vision and supporting goals are known and being met by all center staff
- Customer Interviews-documentation of customer satisfaction
- Random review of at least 10% of active, exited, and self-attestation participant files monthly
- Review of ADA and EO compliance procedures
- Review of customer flow from Adult Basic Career Services to Intensive and Training Services with review of activity notes indicating case management meetings with customers on a regular basis
- Resource Management, Action plan documentation of partnerships and outreach to the community with specific activities noted-not a list of contacts (attain at least one new partner each quarter), marketing efforts, career fairs, kiosks at career center or community events throughout the year, schools, etc.
- Invoices for program expenditures properly filed and accounting records reviewed, documentation of property purchased with WIOA funds
- Customer Service plan reviewed, revised, and documentation of issues with a corrective action plan addressed and signed by center staff conducted quarterly at a minimum
- Documentation of center staff, leadership, and CFLA management team meetings including partners

Please attach this checklist to your documentation as you conduct internal reviews and keep in an agency notebook for review. If you have questions or need assistance, please contact your program manager.
DOCUMENTS TO BE PRODUCED FOR REVIEW UPON MONITORING

☒ 1. Contractor’s Statement of Work (SOW) and Request for Proposal (RFP)

☒ 2. Contractor’s current organization chart with position titles and names of employees serving in those positions. Include staff job descriptions (revised if responsibilities have changed since previous program year)

☒ 3. Contractor’s personnel policies related to EEO, Grievances, Non-Sectarian, Nepotism, and Travel Policies

☒ 4. Individual Training Account and/or Non-ITA Master List of Expenditure Amounts for current program year by customer name

☒ 5. Documented Internal Monitoring Reports

☒ 6. Workforce Innovation Opportunity Act signed into Law by President Obama July 22, 2014

☒ 7. Cape Fear Local Area Policies/Procedures

☒ 8. Program Eligibility Determination Process (current income chart)

☒ 9. Office space rental or lease agreements (as applicable)

☒ 10. Provide Photocopies of the following blank forms used by the contractor to document: Time sheets, school attendance bi-weekly, transportation reimbursement, childcare, supportive services costs (as applicable)

☒ 11. NCWorks Online Detailed Reports (onsite review)

☒ 12. Documentation of delivery of the following required services: agency brochures/flyers, updated employer list for OJT/WEX opportunities, written activity notes in NCWorks with the appropriate activity code selection, partnerships developed, and follow-up activity notes for all WIOA Title I programs

☒ 13. Review Copies of Participant Time Sheets/Agreements for any OJT and Work Experience customers (as applicable)

☒ 14. Review Copies of Participant Child-Care and Travel/Transportation Documentation (as applicable)

☒ 15. Review Documentation of Supportive Services

*For any item that is not applicable above, please write N/A and explain. Please scan in all documents for the months requested and upload to Dropbox (see email for instructions).
ATTACHMENT

"B"
FISCAL MONITORING INCLUDES THE FOLLOWING:

1. Financial Procedures
2. Financial Testing
3. Staff Salaries
4. Travel
5. ITAs
6. Participant Information
7. OJT or Work Experience
8. Indirect Costs and Joint Costs
9. Program Income
10. Property Management
11. Other Financial Compliance Issues
12. Internal Monitoring Procedures
13. Technical Assistance/Corrective Actions
14. Budget Analysis

DOCUMENTS TO BE PRODUCED FOR REVIEW UPON MONITORING

☐ 1. Workforce Innovation Opportunity Act signed into Law by President Obama July 22, 2014
☐ 4. Organizational Chart
☐ 5. Written Agency Personnel Policy
☐ 6. Non-Expendable Equipment Lease Agreement
☐ 7. Non-Expendable Equipment Purchase Approval
☐ 8. Property Inventory List
☐ 9. Office space rental or lease agreements (as applicable)
☐ 10. Fidelity Bonding Policy
☐ 11. Master policy for Retirement/Pension Plan
12. Indirect Cost Agreement (as applicable)

13. Written Cost Allocation Plan (shared costs that are direct charges) (as applicable)

14. Written Accounting Procedures

15. Individual Training Account (ITA) and Non-ITA Master List for current program year* (as applicable)

16. Monthly Financial Status Report and Request for Funds (This is the form you submit to the COG each month for reimbursement of your expenses)

17. Original Invoices to Support # 16 Above

18. Chart of Accounts

19. General Ledger Monthly Trial Balance Documentation

20. Bank Reconciliation Statements

21. Staff Time Sheets

22. Staff Leave Records to support time sheets

23. Staff Travel Vouchers

24. Quarterly Tax Reports

25. W-4 Tax Withholding Forms for WIOA staff

26. Copies of Participant Time Sheets for any OJT and Work Experience customers during months tested (as applicable)

27. Participant Travel/Transportation Documentation as applicable for months tested (as applicable)

28. Participant Child-Care Documentation (as applicable)

29. Workmen's Compensation or Accident Insurance Policy for WIOA Participants

30. Canceled Checks

For any item that is not applicable above, please write N/A and explain. Please scan in all documents for the months requested and upload to Dropbox (see email for instructions)