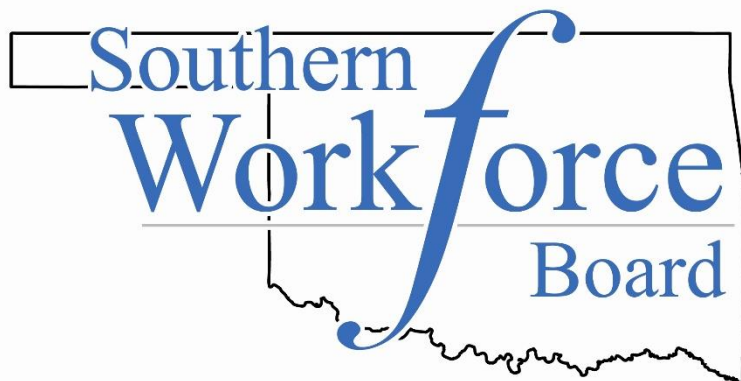


SOUTHERN WORKFORCE BOARD, Inc.



Monitoring & Quality Assurance Policy

SWB - #114

January 25, 2006

Revised September 1, 2006

August 22, 2013

June 20, 2018



SWB is an Equal Opportunity Employer/Program and Activities. Auxiliary aids and services are available upon request to individuals with disabilities.

BABEL NOTICE (29 C.F.R. § 38.9(g) (3)): This document contains vital information. If English is not your preferred language, contact One Stop Operator, ososouthern@gmail.com, 1414 E. Wade Watts Ave. McAlester, Ok. 74501 (580)634-1853 TTD/TTY: 711 or 800-722-0353 to obtain translation and/or interpretation services for the content of this document

I. BACKGROUND

The Governor requires that there be expanded oversight and monitoring activities to ensure compliance with all programs administered by the Oklahoma Office of Workforce Development (OOWD). The programs and governing regulations are: Workforce Innovation and Opportunity Act at 20 CFR Part 680 and policies as issued by the OOWD and the United States Department of Labor (US DOL).

The Chief Local Elected Official and the Southern Workforce Board are responsible for ensuring oversight and monitoring of programs funded through the OOWD and the US DOL. The Southern Workforce Board and Fiscal Agent are responsible for monitoring all workforce development programs/employment and training programs for implementation of federal, state and local policies and procedures to ensure compliance.

II. FISCAL ISSUE

A. Fiscal Agent Responsibilities

Pursuant to the minimum standards established by the Governor, it is the responsibility of the fiscal agent and/or fiscal agent entity and/or Board staff to develop specific policies and/or procedures to ensure fiscal accountability and accuracy. Fiscal Agent responsibilities are found in the SWB/LEO/Fiscal Agent Agreement.

B. Fiscal Monitoring

The Chief Local Elected Official has designated the Southern Workforce Board, Inc. as the Fiscal Agent, as designated by the Local Elected Officials, shall be responsible for the “primary” Fiscal Compliance Monitoring pursuant to the OOWD’s Issuance and Monitoring Tool. The Fiscal Compliance Monitoring to be conducted will cover:

- Grant Recipient Fiscal Operational Policies and Procedures
- Accounting System, Entries and Documentation
- Procurement Methods and Documentation
- Contracts Verification
- Internal Control
- Personnel and Payroll Records

III. SERVICE PROVIDER MONITORING

A. Minimum Standards

The Governor has established minimum standards that each local Board shall follow for ensuring that all service providers are monitored throughout the year. The monitoring shall be conducted on all programs awarded through the OOWD with oversight by the Southern Workforce Board.

The minimum standards are:

- Compliance with Federal Regulations

- Compliance with Local established policies
- Participant eligibility verification documentation
- Proper sequencing of services
- Review of reports on program performance
- Review of records for assessment and employability plan
- Review of Contracts (OJT and Customized) and Subcontracts
- Review of Agreements (Work Experience/Limited Internship)
- Compliance with American Disabilities Act, Equal Opportunity, Fair Labor Standards Act, and Nondiscrimination

B. Monitoring Process of Service Providers

The Board's staff will conduct a comprehensive monitoring of the Service Providers on behalf of the Board for the WIOA Adult Program, WIOA Youth Program, and WIOA Dislocated Worker Program, National Emergency Grant, Business Services and/or other grants and contracts as awarded by the OOWD and US DOL.

The Board support staff will have access to all plans, contracts, grants, sub grants, worksite agreements, records and files. The staff will be provided with all pertinent work papers, correspondence and reports – as well as all federal, state and local regulations, issuances, policies, procedures and memos pertaining to WIOA and any other Oklahoma Office of Workforce Development or United States Department of Labor correspondence as it pertains to grants and contracts awarded to the Board.

The comprehensive monitoring will be conducted at least once per Program Year unless such monitoring findings deem it necessary to conduct another review for corrective action plans. In the event that the contracted services provider is new, a post-award on-site monitoring will occur within 120 days of the start date of the contract.

The scope of comprehensive monitoring efforts for each program activity will consist of:

- The monitoring activities will be conducted by the Board staff utilizing a monitoring tool along with desk reviews, personal visits, telephone contacts, email communications, OkJobMatch reviews and onsite visits resulting in a summarized report.
- There will be a review of policies and procedures governing all segments of the Service Provider's program activities and program operations at least once during the Program Year.
- Sub-recipients providing services to participants/registrants of the programs shall be monitored at least once during the Program Year by the Board Staff.
- Vendors providing services to participants/registrants of the programs shall be monitored at least once during the Program Year by the Service Provider and/or Board staff for programmatic accountability.

- Board staff will review a sample of participant/registrant files for determination of program eligibility.
- Board staff will review the One Stop Operator's, and Board's compliance for comprehensive centers, management team procedures, EEO, Nondiscrimination and other activities as described by the Board.
- Service Provider staff will be responsible for reviewing each participant/registrant file or OkJobMatch screen for determination of program eligibility. Board staff will review a sample of files for verification of such monitoring of participants/registrants.
- Fiscal Agent's staff and Board staff will be responsible for the financial, procurement, and contract activities monitoring by reviewing sample procurement and contract activities for compliance with Circulars and Federal, State and Local regulations, policies and procedures utilizing the Board's monitoring tool.

C. Monitoring Staff

The Southern Workforce Board Quality Assurance Monitors and the Fiscal Officer and/or Executive Director will be responsible for the following comprehensive monitoring activities on behalf of the LEOs and Board for compliance with Federal, State and Local policies, procedures, rules and regulations:

- Annual Audits
- Personnel Policies
- Travel Policies
- Review of the One Stop System, One Stop Operator(s) and/or System Coordinator, and / or Management Team(s)
- Review of Service Provider Contracts
- Review of Board membership, composition, compliance with federal, state and local statute, regulation, policy and procedure
- Sample Review of Service Provider Procurement
- Sample Review of Service Provider Participants
- Review of Service Provider adherence to Board policies
- Review of Subcontracts
- Review of Subrecipients
- Review of Nondiscrimination, EEO, ADA, and FLSA Compliance
- Review of Program Reports of Performance

The Quality Assurance Monitors will also be responsible for the following comprehensive monitoring activities on behalf of the Board for all programs and service providers:

- A Sample review of participant/registrant records for compliance with Federal, State and Local program policies (Assessment, Employment Plan, ITA, Priority)

- A Sample review of participant/registant records for eligibility verification documentation
- Policy and Procedure Review for services to customers for:
 - Outreach and Recruitment
 - Eligibility for Services
 - Assessment and Service Planning
 - Service Delivery
 - Counseling and Case Management
 - Customer Supportive Services
 - Training Services
 - Referrals to other agencies / resources
 - Follow-up Services
- A Sample review of participant/registant records for verification of proper delivery and/or sequencing of services
- A Sample review of completed Service Provider monitoring of participant's/registant's eligibility, services and corrective action
- A Sample review of completed Service Provider and/or Board staff monitoring of Vendors
- A Sample Review of Service Provider Work Experience Agreements
- A Sample Review of Service Provider On-the-Job Training Contracts

IV. ONE STOP SYSTEM MONITORING AND QUALITY ASSURANCE

Board staff for the Southern Workforce Board shall complete the section of the Tool with regards to the Board's oversight of the One Stop System. The review will include monitoring of One Stop Operator Agreement(s), Partnership Agreement(s), One Stop referral processes, One Stop confidentiality releases, Memorandum of Understanding, Cost Allocation/Resource Sharing, Board required reports, compliance with federal statute and regulations, and state and local policies with regards to the One Stop system, Centers or satellites.

V. WORKFORCE BOARD MONITORING AND QUALITY ASSURANCE

Support staff for the Southern Workforce Board shall also complete the section of the Tool with regards to the Board's compliance with federal, state and local policies for Board membership, By-laws, composition compliance, Open Meetings Act, Open Records Act, nepotism and other activities as described by the Board.

VI. MONITORING / QUALITY ASSURANCE REPORT DISTRIBUTION AND CORRECTIVE ACTION

The monitoring tool, along with a summarized report, will be prepared by the Board staff and Fiscal Agent on behalf of the Board and Fiscal Agent, and transmitted to the Board's Chairman and Chief LEO and the Service Provider's Executive Director(s).

One Stop Operator(s) will also receive written notification of any corrective action that is determined necessary as a result of the monitoring of the local One Stop System. In the event of findings, the One Stop Operator(s) will also comply with the below description for the resolve of findings or corrective action as described for Service Providers.

Once the Service Provider has received the report, the entity will have 30 days in which to respond in writing to any noncompliance findings. If deemed necessary, the Service Provider may request an extension for additional time to resolve the findings.

The Service Provider's response must contain planned corrective action to be taken in regards to the findings. Observations will not require a response, but may initiate technical assistance between the Board staff and the Service Provider.

Once the planned corrective action is received, the Board staff will distribute to the Board Chair and Chief LEO for discussion, acceptance, or rejection of such planned correction action. A written letter prepared by Board Staff will be provided to the Service Provider once a determination is made by the Board's Chair and Chief LEO. Board staff are responsible for ensuring/validating that all findings in question have been corrected. The Board Chair and/or Chief LEO may also establish a date for a second comprehensive monitoring review due to numerous reoccurring or questioned cost findings.

VII. DISTRIBUTION OF MONITORING/QUALITY ASSURANCE POLICY, PROCEDURE AND TOOL

All Service Providers, ~~and~~ Subcontractors and One Stop Operator(s) will be provided a copy of this policy as well as a copy of the Tool in order to prepare for the Board staff to conduct its monitoring and quality assurance activities. The policy was, and will continue to be, distributed declaring it as policy for the service provider, fiscal agent, and One Stop Operator(s).

This policy as well as the Tool are to be kept as a part of the Southern Workforce Board, Service Provider, Fiscal Agent, Subrecipient and One Stop Operator's permanent records.