



RIVERSIDE COUNTY
ECONOMIC DEVELOPMENT AGENCY

POLICIES & PROCEDURES

Date: June 6, 2003

Number: 17-01

SUBJECT: PROGRAM MONITORING

PURPOSE: To establish policies and procedures that will guide the Riverside County Economic Development Agency (EDA) Workforce Development Division in conducting effective program monitoring, providing technical assistance to ensure program quality and fiscal integrity, and rendering accurate and comprehensive reports of monitoring activities.

REFERENCES:

Workforce Investment Act (WIA) Sections 117(d)(4), 183 and 184(a)(4)

Code of Federal Regulations (CFR) Title 20 Sections: 667.400(c)(1), 667.410, 667.505 and Section 667.510

20 CFR Sections 645.245, 645.250 (a)(1)(2) (3), and Section 645.425(b)(7)

Workforce Investment Act Directive WIAD00-7, April 10, 2001

SUPERCEDES: Riverside County EDA Policy and Procedures 93-12, dated October 1, 1993, and Draft Program Monitoring Field Memorandum dated March 8, 2001.

LOCALLY IMPOSED REQUIREMENTS: Locally imposed requirements are indicated in ***bold, italic*** type.

EFFECTIVE DATE: January 1, 2003

BACKGROUND:

Title IV Part A of the Social Security Act which governs the Provisions of the Welfare-to-Work grants, the Workforce Investment Act and the Code of Federal Regulations, as cited above, require local boards establish policies to monitor service providers on a yearly basis to ensure the following:

DISTRIBUTION: WDB; SP; ADMIN; PPD; FISCAL; PROG.COMP.; CUST.SERV.

- Compliance with applicable uniform cost principles included in the appropriate Office of Management and Budget (OMB) circulars for the type of entity receiving the funds
 1. OMB Circular A-21 Institutions of higher educations
 2. OMB Circular A-87-State, Local, and Indian tribal governments
 3. OMB Circular A-122-Nonprofit organizations
- Compliance with appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving funds as regulated by OMB circulars
- Compliance with Workforce Investment Act (WIA) and applicable federal, state and local regulations
- Tangible positive outcomes at a cost in line with planned expenditure
- Procurement, receipt, and payment for goods and services from vendors comply with OMB Circular A-133 and provisions of the vendor agreements
- Fiscal integrity
- Safe training and working environment for both program participants and staff
- Compliance with contract stipulations and assurances
- Participant eligibility certification and verification
- Compliance with nondiscrimination and equal opportunity in contracts, job training plans and policies and procedures

POLICY:

EDA Workforce Development Division's (WDD) Program Development staff will monitor Workforce Investment Act and other federally funded training programs in accordance with the mandated provisions and provisions contained herein.

Service providers will be monitored once a year during the term of the contract. WDD Program Development staff may conduct both a technical assistance visit and a monitoring review of contractual, programmatic and fiscal areas. The technical assistance review may be conducted in preparation for the monitoring review.

The monitoring review will provide service providers with an assessment of the contracted programs that will result in, if applicable, improved operations, systems and/or communication. The desired result is to enhance program services to the participant by coordination and collaboration with the service provider and other Riverside County EDA WDD units. Specific information to be provided includes:

- Provision of technical assistance regarding contractual, fiscal, and/or programmatic requirements
- Provision of technical assistance review summaries identifying areas requiring follow-up
- Monitoring reports identifying significant areas of noncompliance and recommended, corrective action plans
- Identification of timelines identifying date corrective action plans will be in place.
- Follow-up timelines and information

The technical assistance and monitoring system shall also make special note and recognition of service provider(s) with effective program performance and best practices.

PROCEDURES:

Scheduling

Notification of visit and/or reviews will include both a telephone call and a confirmation letter with advisement of date and time of visit. The confirmation letter will be sent to the service provider approximately two weeks prior to the visit identifying the following:

- Date
- Time
- Place of review
- Purpose of review
- Areas and materials to be reviewed
- Documents to be completed by service provider

Desk Review

Prior to the technical assistance or monitoring visit, the Desk Review will be conducted. The Desk Review will consist of a comprehensive review of current program information and reports on file at the EDA Workforce Development Center relating to the service provider's contract and performance.

Review of the contract will be conducted with special attention to language or practices that would be inconsistent with program goals or cause inconsistencies in the field of service. EDA Program Administrator (PA) will cite any discrepancy with the contract and present it to the assigned Program Development (PD) staff. The PA will make recommendations for corrective action that may include one or more of the following actions:

- Contract modification
- Clarification of contract language to ensure consistency in the field
- Revision of the scope of work allowing for consistency in both practice and the contract

The corrective action will be documented in the contract monitoring file, prior to the Technical Assistance Summary or Monitoring Report once the on-site visit has been conducted.

Performance summaries obtained from EDA Management Information Systems staff will be reviewed for planned versus actual performance and compared for consistency and accuracy with data obtained from Program Outcomes Performance report (POP) or from the contractor during the on-site visit.

The Desk Review will also include, but is not limited to, a review of fiscal data, previous monitoring reports, contact information, correspondence and participant files. The data will be analyzed to determine areas of strengths and weaknesses that will be reviewed in the field during the on-site technical assistance and/or monitoring visit. Information obtained as a result of the Desk Review will also assist in focusing and, if necessary, expanding the scope of review in specific areas.

On-Site Visit

The on-site visit will permit Program Development staff to verify or negate data and information obtained from the Desk Review that may lead to identification of areas of non-compliance. The review will be conducted using standard review guides designed to identify strengths and weaknesses. The process and major areas of focus during the on-site review are:

- Entrance interview-Staff will conduct an entrance conference with the service provider's program administrator or designee to convey the purpose and focus of the visit and to inform the service provider of specific tasks to be completed during the visit.
- Evaluation of Performance-Staff will review and determine the degree of contractual compliance in meeting program performance goals. Staff will also identify the causes in those areas where non-performance is identified.
- Facility Observation-A tour of the training site will be conducted to assess the adequacy of the facility as it relates to, but is not limited to, accessibility for disabled, health and safety, comfort, and adequacy of training equipment.
- Records Review-Validation of information from the Desk Review will be completed by review of administrative records, contract files, fiscal records, participant files, and other records deemed to be pertinent to the review.
- Interviews-Interviews will be conducted with service provider staff, participants and employers to obtain information about program administration, operations, and the quality of the training.
- Exit Conference/Interview-An exit conference will be conducted with the service provider's program administrator or designee to discuss results of the monitoring or technical assistance review, identify required corrective actions and offer technical assistance.

Review Summaries and Reports

A technical assistance summary or a monitoring report will be drafted reflecting the analysis of the data and information gathered through the desk review, the technical assistance visit or the on-site monitoring.

Technical Assistance Summary

The technical assistance summary will identify areas needing improvement and provides PD staff and service provider(s) with an opportunity to amend, modify or correct any problem area identified by the PA prior to the monitoring review. These

must occur prior to the monitoring visit. The service provider and/or the PD staff must report the corrective action taken within the designated time frame determined by the PA.

Monitoring Report

The monitoring report will identify areas of non-compliance noted as findings with the required corrective actions. Both the technical assistance summary and the monitoring report will be submitted to the Workforce Development Administrator and/or designee for review and/or signature prior to submission to the service provider.

The service provider will respond and implement corrective action within 30 working days from the receipt of the monitoring report. Service provider's responses to the monitoring report are submitted to EDA Program Development staff to determine if the corrective action is sufficient. Service provider's response will be included as part of the monitoring file.

Should the service provider fail to respond to the monitoring report, the service provider may fall under contract sanctions including, but not limited to, the following:

- Reduction of the contracted budget
- Modifications and/or changes to the scope of work
- Withholding of payments or reimbursements until provision of required documentation or corrective actions has been implemented and reviewed by EDA staff
- Notification of unresolved performance deficiencies and questioned or disallowed costs
- Suspension of program operations or
- Termination of the contract

If the service provider's response is determined to be insufficient to remedy deficiencies, EDA staff will further delineate required action.

Follow-Up

Follow-Up will be conducted following receipt of the monitoring report response to ensure the service providers have initiated appropriate corrective action in the areas noted in the monitoring report and/or technical assistance summary. This may necessitate subsequent on-site visits.

Technical Assistance

Needs identified during the on-site Technical Assistance visit will be addressed and scheduled as soon as possible with the appropriate EDA Program Development staff. Service providers shall be advised technical assistance is available on an ongoing basis.

Summary/Report Format

Technical Assistance Summary

The Technical Assistance summary will be completed after the technical assistance visit. The summary will consist of a cover letter and an attached summary outline. This will be submitted to all affected parties and service provider's Program Compliance file.

- The cover letter will identify:
 1. Date of the visit
 2. Contract or program reviewed
 3. Purpose of the Technical Assistance visit
 4. EDA Program Development staff conducting the technical assistance visit
 5. Attached summary outline

- The summary outline will identify:
 1. Programmatic areas requiring modification or improvements
 2. Fiscal areas requiring modification or improvements
 3. Corrective action necessary prior to monitoring
 4. Effectiveness of collaboration
 5. Provision of technical assistance provided

Monitoring Report

The monitoring report shall be submitted to the service provider approximately 30 days after the monitoring review has been completed. The monitoring report will consist of information specific to the program and contract reviewed within the introductory paragraph. The body of the report will identify review results regarding the following:

- Fiscal Management-Evaluation of appropriate actions and documentation of all fiscal matters relating to the contract
- Program Management-Assessment of the overall management of the program and systems. Areas included are, but not limited to, staffing, organizational structure, curriculum, staff qualifications, adherence to the Workforce Investment Act and Riverside County EDA policies, procedures and regulations. The service provider's ability to implement planned services and meet required completion and submission of required paperwork are also assessed.
- Program Performance-Assessment of planned performance or provision of services to date
- Previous Monitoring Findings-Review and status of previous findings, recommendations, and corrective actions from the previous monitoring review, if applicable
- Findings-Areas requiring corrective action or process and a specific date for implementation
- Corrective Actions Required-Corrective actions are stipulated immediately following a finding of obvious or evident violations of law, regulations or policy as well as breaches of contract provisions.
- Recommendations-Included to assist the provider's resolution, performance

- improvement or service enhancement for program participants
- Disclaimer-Because the monitoring is conducted on a sample basis, the report should not be considered a comprehensive assessment of the program factors monitored. It is the responsibility of the service provider to ensure systems, programs, and outcomes comply with Workforce Investment Act law and regulations, the Family Economic Security Act, the American with Disabilities Act and all other applicable state and federal policies. Therefore, deficiencies identified in a subsequent review, such as an audit, would remain the sole responsibility of the service provider

Report Response

Upon receipt of the monitoring report, the service provider has approximately 30 working days in which to respond with corrective action taken or the timeline indicated when corrective action will be completed. Should the monitoring report indicate the contract to be in general compliance, no response is necessary.

Sufficient Response Letter

Once the service provider has submitted a response to the monitoring report, EDA staff will review for sufficient corrective action. Once this has been determined, a letter of sufficient response will be sent to the service provider approximately 30 days of receipt from the monitoring report response. Should it be determined the response was insufficient, then an insufficient response letter will be sent to the service provider, and the response process will be repeated.

Please direct any questions or concerns regarding this Policy and Procedure to the Workforce Development Division's Program Development Manager.



Jerry Craig, Workforce Development Administrator
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