OVERVIEW OF
LOCAL MONITORING & CASE FILE MONITORING

Presented by:
Bureau of Workforce Development Administration, Oversight Services
March 21, 2024

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PURPOSE

In today's training, you will learn:

1. BWDA's latest request for information pertaining to fiscal integrity and local board monitoring and the purpose of collecting the information.

2. What gets reviewed during BWDA's LWDB monitoring review

3. Requirements of LWDB monitoring of subrecipients

4. Case file reviews

5. Historically common local monitoring findings and how to avoid them

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Section 1:

BWDA PY 2023 March 2024 Monitoring Document Request

What you need to submit…

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Local Monitoring Documentation Request

BWDA request generated 03-01-2024. Due 03-22-2024.

Fiscal Integrity Items requested:

1. A listing of all WIOA expenditures for PY 2023 to current.

2. Copies of the completed 2022 Statement of Financial Interests forms (due May 1, 2023) for LWDB staff directors and senior-level fiscal agent personnel at the LWDB office possessing the authority to review or approve expenditures or the allocation of funds.

3. All timesheets and payroll documentation for LWDB staff, which shows distribution of time and pay across program and administrative funding streams as well as annual salary, for the period December 2023 and January 2024.

4. A completed copy of the PY2023 Separation of Duties worksheet.

5. A copy of the most recent completed Single Audit.

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Local Monitoring Documentation Request

Local Monitoring Items Requested:

1. A copy of the local area's current local oversight plan and completed subrecipient risk assessment.

2. Copies of completed monitoring tools, reports, and corrective action plans/resolution reviews for the monitoring of the WIOA Title I program, including formula-funded activities, activities using WIOA discretionary funds, and specialized WIOA-funded National Dislocated Worker Grant programs. This includes any monitoring of ITA providers and OJT employers.

3. Copies of completed monitoring tools, reports, and corrective action plans/resolution reviews pertaining to the certification of each PA CareerLink® comprehensive site, affiliate site, and/or specialized center, including mobile service sites within the local area.

4. Copies of completed monitoring tools, reports, and corrective action plans/resolution reviews for the monitoring of the One-Stop Operator and its performance.

5. Blank copies of any relevant monitoring tools not used to monitor the local workforce system in PY 2023.

6. A completed copy of the PY2023 One-Stop Operator Monitoring Form, the Performance Monitoring Form, and the Fiscal Monitoring Form.

A note about local monitoring: Documentation from any PY2023 monitoring performed by a local area between the due date until June 30, 2024, must be submitted to BWDA no later than Friday, July 12, 2024, at Noon. This will allow Oversight Services time to meet its monitoring and reporting deadlines for the organizations which monitor L&I. This is not currently enshrined in policy; however, it has been determined to be necessary to keep up with compliance obligations and requirements. Local areas should plan their local monitoring accordingly to avoid compliance findings or concerns.

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Select an answer…

A. Complete BWDA monitoring tools.

B. Compare information when conducting case file reviews.

C. Review for best and promising practices.

D. Provide technical assistance when deficiencies are present.

E. Store the information for future reference and drafting monitoring reports.

F. All the above

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Section 2:

What gets reviewed in BWDA's LWDB monitoring review?

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Monitoring of Plans, Tools, & Risk Assessments

BWDA will review the LWDB subrecipient monitoring plans, tools, and local policies to ensure compliance with the Bureau's [Oversight and Monitoring Policy](#), [Financial Management Policy](#), and [Financial Management Guide (FMG).](#)

LWDBs must provide completed monitoring tools for each subrecipient during the program year to verify:

- Completed **administrative**, **programmatic**, and **fiscal** monitoring for compliance with federal, state and local laws, regulations, contract provisions/grant agreements, policies, and official directives, and compliance with the appropriate uniform administrative requirements for grants and agreements.

- Risk assessment which determines the frequency of subrecipient monitoring.

- Reporting and resolution requirements.

- Documented controls through documented monitoring reports and follow-up meetings with subrecipients.

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Section 3:

Requirements of Local Monitoring of Subrecipients

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Local Oversight/Monitoring Plan

The local oversight plan must be designed to demonstrate that the LWDB can meet the requirements of the grant agreement, on time and within cost limits, and must identify the purpose of performing the oversight activities.

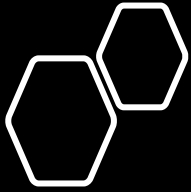**At a minimum**, the local oversight plan **must** address:

Oversight Process

Risk Assessment

Frequency

Schedule and Timeline for the current PY

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Evaluate Your Local Monitoring Plans

At minimum, monitoring of administrative functions must be completed **at least once per program year**, monitoring of programmatic activities must be conducted **at least quarterly**, and fiscal monitoring must be conducted **at least once during the contract period**.

Conducting monitoring early in the program year

- Allows local areas to accurately determine the sub-recipient risk assessment level in order to develop the monitoring schedule/frequency.

- Ensures that an entity can meet the requirements of the grant agreement on time and within cost limitations.

- Identifies instances of noncompliance and provides recommendations for corrective action for timely resolution within the program year.

- Evaluates the effectiveness of oversight processes.

- Provides timely and required monitoring documentation to BWDA and ETA.

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Risk Assessment

LWDBs are required to incorporate a risk-assessment approach as part of the Oversight Plan. **Risk assessment results must inform the frequency and manner in which oversight will take place.**

The risk assessment **must**:
- Assess risk.
- Identify frequency in which to monitor subrecipients.
- Identify the factors used to assess risk. **At a minimum**, the following must be evaluated:
  - ✓ Is the service provider new to operating or managing a state or federal funds, or has not done so within the past five years?
  - ✓ Whether the sub-recipient has new personnel or new or substantially changed systems.
  - ✓ The extent and results of Federal awarding agency monitoring. Does the provider lack effective operational and fiscal procedures and controls?
  - ✓ The results of previous audits including whether the sub-recipient receives a Single Audit in accordance with 2 CFR 200, Subpart F, and the extent to which the same or similar sub-award has been audited as a major program.
  - ✓ What is the contractor's share of the local area's allocation?

- Project the risk by assigning well-defined, supported point values to a scoring system. The numerical ratings must be used to determine overall risk, and how often to monitor each subrecipient. Local boards must classify service providers as high-risk, medium-risk, or low-risk.

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Section 4:

Case File Reviews

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Adult and Dislocated Worker Monitoring

BWDA will monitor required documentation and conduct case file reviews for the following:

Eligibility Determinations	Eligible Training Provider and Training Program Information
Electronic Individual Employment Plan (IEP)	Assistance in Establishing Eligibility for Programs of Financial Aid Assistance
Outreach, Intake, and Orientation	Services to Obtain or Retain Employment
Initial Assessment of Skill Levels, Aptitudes, Abilities, Barriers/Supportive Service Needs	Interviewing and Evaluation to Identify Employment Barriers and Establish Goals
Labor Exchange Services	Follow-Up Services
Referrals/Coordination of Services	Information and Assistance Regarding Filing Unemployment Compensation Claims
Labor Market Information	Availability of Information in Usable and Understandable Formats

Secondary Supervisory Reviews for WIOA Participants

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Youth Monitoring

BWDA will monitor required documentation and conduct case file reviews for the following:

Eligibility Determinations	Eligible Training Provider and Training Program Information
Electronic Individual Service Strategy (ISS)	Assistance in Establishing Eligibility for Programs of Financial Aid Assistance
Assessments of Skill Levels, Barriers, and Service Needs	Services to Obtain or Retain Employment
Service Strategies for Career Pathways	Interviewing and Evaluation to Identify Employment Barriers and Establish Goals
Educational Goals and Services	Follow-Up Services
Referrals/Coordination of Services	Secondary Supervisory Reviews for WIOA Participants
Labor Market Information	The availability of the 14 Youth program elements

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Case File Monitoring Tools

Based on WIOA, the U.S. DOL Core Monitoring Guide, PA L&I Policy, BWPO Guidance, and the 2023 Case File Monitoring Touchpoint, Oversight is in the process of updating PY 2023 case file monitoring tools.

Timely and complete data entry into the System of Record.

Eligibility documentation and second level/supervisory review.

Emphasis On

Creation and maintenance of the IEP and ISS documents.

Documented training, supportive service, needs-based, and incentive payments.

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SYSTEM OF RECORD POLICY

- Requires that **all** WIOA, Wagner-Peyser, and Trade Adjustment Act participant, provider, employer and financial data be recorded in the Commonwealth's PA CareerLink® System of Record.

- The System of Record Policy must be reflected in the LWDB bylaws.

- It is recommended that the data be entered as soon as possible to ensure accuracy but must be entered within 30 days.

- Pandemic restrictions have highlighted the importance of complete electronic case records.

If service providers are located offsite and/or are meeting participants offsite of a PA CareerLink® Center:

It is the responsibility of the service provider to ensure that participants are:

- Fully enrolled in the PA CareerLink® system

- Introduced to the full array of available services through the PA CareerLink® partner system (Document with a case note within the PA CareerLink® system of record)

- Referred to applicable and beneficial services throughout the PA CareerLink® partner and referral system (Document with a service and case note within the PA CareerLink® system of record)

These items must be monitored by the service provider and by the Local Workforce Development Boards

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Section 5:

Historically Common Local Monitoring Findings and How to Avoid Them

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Historically Common Local Monitoring Findings

Incomplete subrecipient monitoring.

Missing elements in the monitoring tools.

Untimely, deficient, or missing data in the system of record.

Incomplete documentation for eligibility determinations.

Incomplete IEP and ISS documents.

Deficient documentation for supportive services.

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How to prevent future and
repeat local monitoring findings

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REFERENCE POLICY

WIOA Section 129
Mandates the use of funds for Youth Workforce Investment Activities

WIOA Section 134
Mandates the use of funds for Employment and Training Activities

WSP No. 183-01 (Change 1), April 15, 2019
   Oversight and Monitoring policy

WSP No. 03-2015, December 22, 2015
   This Financial Management Policy includes the Financial Management Guide AKA 'The FMG'

Regularly review the Bureau's Workforce System Policies and use them to conduct regularly scheduled reviews of local policies, procedures, trainings, and monitoring tools.

Protect Personally Identifiable Information (PII) and handle as required.

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Visit the CWDS 2.0 Help Center

Frequently Asked Questions (FAQs) (77) | Documents (329) | Policy & Procedures (7)

Groups

How-Tos (74) New

Desk Guides & Training Materials (156) New

Miscellaneous (99) New

How-Tos

> All Users

> Employers New

> New Hire Reporting Program Employer Guides New

> Participants New

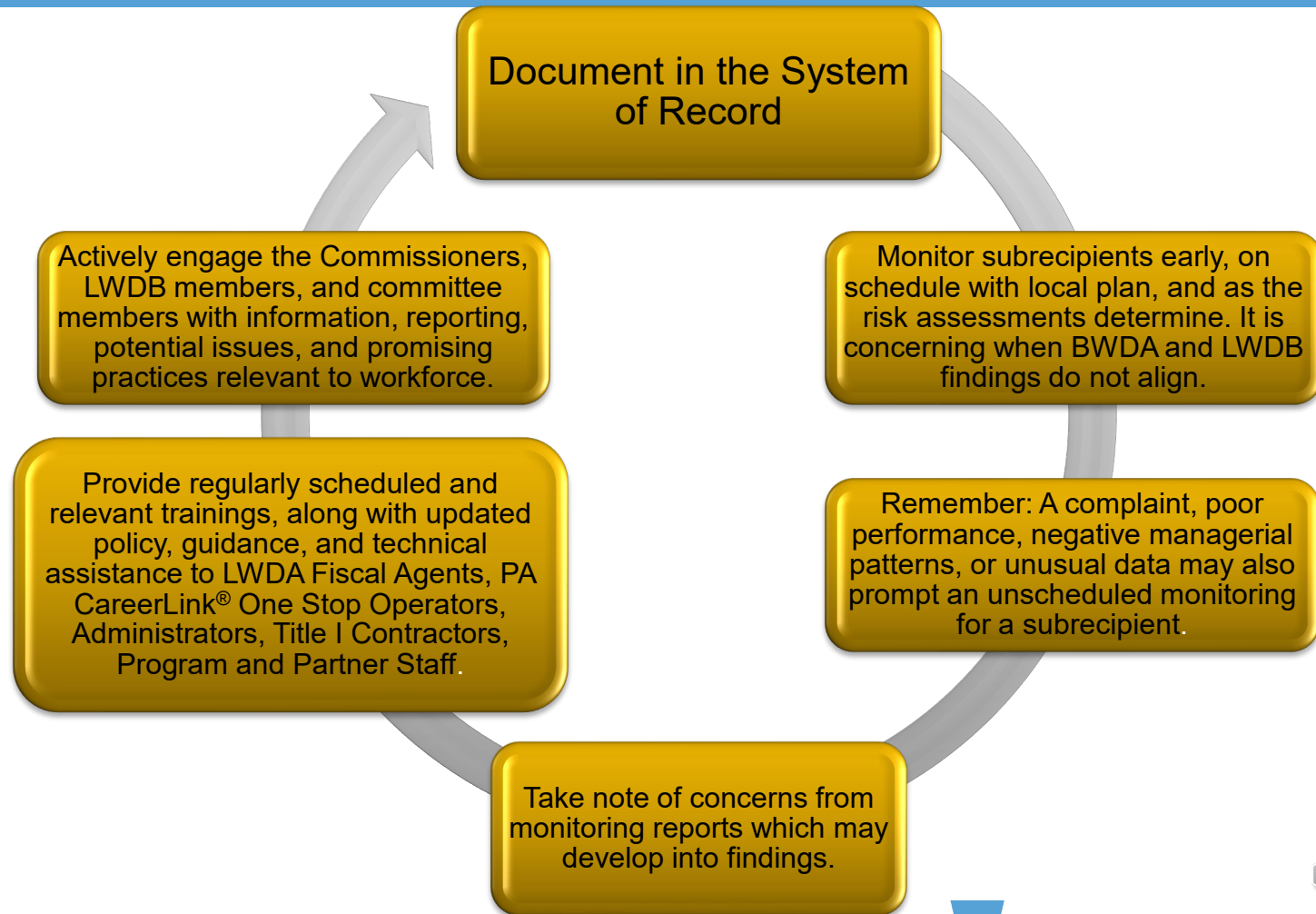> Service Providers New

⌄ All Staff New

> Workforce Staff New

> Job Seekers New

> WIOA New

> Manuals New

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Document in the System of Record

Actively engage the Commissioners, LWDB members, and committee members with information, reporting, potential issues, and promising practices relevant to workforce.

Monitor subrecipients early, on schedule with local plan, and as the risk assessments determine. It is concerning when BWDA and LWDB findings do not align.

Provide regularly scheduled and relevant trainings, along with updated policy, guidance, and technical assistance to LWDA Fiscal Agents, PA CareerLink® One Stop Operators, Administrators, Title I Contractors, Program and Partner Staff.

Remember: A complaint, poor performance, negative managerial patterns, or unusual data may also prompt an unscheduled monitoring for a subrecipient.

Take note of concerns from monitoring reports which may develop into findings.

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Ask Us

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Thank you!

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