

To: Finance Committee

Date: April 3, 2001

For action
 For Information
 Meeting Notes

FROM: WIB Staff

SUBJECT: WIB Oversight (Monitoring)

PROPOSED MOTION: Recommend to the WIB that it delegate oversight authority of activities funded under WIA Title I, to the Merced County Private Industry Training Department, Monitoring Division.

DISCUSSION: Pursuant to the Workforce Investment Act (WIA) of 1998, the Local Workforce Investment Board is charged with the responsibility of assuring program and fiscal integrity of all local WIA sponsored employment and training programs, to include the One-Stop delivery system. The law requires that each Local Workforce Investment Area (LWIA) develop and implement procedures which provide for “checks and balances” of all programs underwritten by WIA Title I allocations. In keeping with the intent of the legislation, PITD’s Monitoring Division conducts monitoring reviews of all WIA grant-supported programs on behalf of the LWIB to assure program compliance with Federal, State and local requirements.

PITD’s monitoring staff is experienced, trained and has established good rapport with all training/service providers as a result of fair and objective monitoring.

OTHER CONSIDERATIONS: Monitoring activities currently performed by the Monitoring Unit:

- OJT contracts
- Work Experience contracts
- Welfare to Work contracts
- Eligible Training Providers (ETPL)
- Year-Round Older and Younger Youth Programs
- One-Stop Delivery System (to include the nine mandated Partners)
- MOUs
- Services contracts (Merced College RN/LVN Program, Tattoo Removal Contract, Merced County Public Works Work Experience contract, etc.)
- Skills Training contracts
- Cost Reimbursement contracts
- Community College Vocational Training Programs
- Private for Profit Vocational Schools and For Profit entities specializing in handicapped and job-readiness programs

ATTACHMENTS: Merced County PITD Monitoring Unit background paper.

MERCED COUNTY PRIVATE INDUSTRY TRAINING DEPARTMENT MONITORING UNIT

BACKGROUND

The WIA Section 117(d) (4) requires that the local WIB, in partnership with the Chief Elected Official (CEO), shall conduct oversight of the WIA programs and the One –Stop delivery system in the local area.

The WIA Section 184(a) (2)(A) requires that each State and local area (including the CEO for the area), and provider receiving funds under Title I shall comply with the applicable uniform cost principles included in the appropriate OMB circulars for the type of entity receiving the funds. Section 184 (a) (3) (A) requires that each State and local area (including the CEO for the area), and provider receiving funds under Title I shall comply with the appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving the funds, as promulgated in OMB circulars or rules.

PROGRAM OVERSIGHT EXPERIENCE

The Monitoring Unit provides oversight activities for the Local Workforce Investment Area and has expertise developed over many years of program monitoring. Currently, two full-time and one extra-help Employment Analysts, with a combined total of thirty-five years of monitoring experience, staff the Monitoring Unit. In addition to the practical experience, the monitoring staff has attended numerous training sessions/seminars in the areas of fiscal monitoring, eligibility determination, performance standards, and the Final Rule. These training sessions have enhanced the staff's skill level in the application of the WIA. Also of significance, the Monitoring Unit has established good working relations with all training/service partners. This rapport has developed over a period of time and has resulted from fair objective monitoring and technical assistance.

PROGRAM MONITORING

The monitoring unit ensures that service providers are in compliance with the terms, conditions, and specifications of their contract/MOU/agreements. The monitoring process verifies that:

- Programs are operated in compliance with Federal, State, and local rules and regulations
- Programs operate at a high level of quality and meet the expectations and needs of their customers
- All required documentation (i.e., certificates of insurance, financial statements, etc.) is on file and is current
- Fiscal integrity is in place by ensuring that costs associated with the training and service contracts are allowable, reasonable, necessary and charged to the appropriate budget cost category
- The training environment is safe for participants and staff
- An effective system is in place to handle Equal Employment Opportunity issues
- Grievance procedures are in place
- Employee displacement does not occur
- A system prohibiting political /sectarian activities is in place
- Customer satisfaction data is obtained via participant interviews
- In addition, follow-ups are conducted to assist contractors in resolving compliance issues

ADDITIONAL SERVICES

In addition to the regular monitoring of training/service providers, the monitoring unit assists in the development of Request for Proposals (RFP), contracts, and also provides technical assistance: i.e. interpretation of the law; the Final Rule to WIA; OMB Circulars; EEO Directives; WIA Bulletins and Directives; Memorandums of Understanding and related documents. Additionally, the staff has provided monitoring presentations to contractors; conducted courtesy participant file reviews; checked contractor's training sites for safety and American Disabilities Act (ADA) compliance, mandatory postings for employers; and Child Labor Laws.

MONITORING ACTIVITIES

Monitoring of the following areas/programs is currently being performed:

- OJT contracts
- Work Experience contracts
- Welfare to Work contracts
- Eligible Training Providers (ETPL)
- Year-Round Older and Younger Youth Programs
- One-Stop Delivery System (to include the nine mandated Partners)
- MOUs
- Services contracts (Merced College RN/LVN Program, Tattoo Removal Contract, Merced County Public Works Work Experience contract, etc.)
- Skills Training contracts
- Cost Reimbursement contracts
- Community College Vocational Training Programs
- Private for Profit Vocational Schools and For Profit entities specializing in handicapped and job-readiness programs

STATE MONITORING REVIEW

A State compliance review of PITD'S fiscal/procurement process was conducted in February 2001. Integral to this review was an assessment of the monitoring staff's fiscal monitoring process. Net result: No findings were noted. The State examiner stated that the monitoring unit's evaluation/review process was very thorough.