Division of Workforce Development and Adult Learning (DWDAL)

Kelly M. Schulz, Secretary
David McGlone, Deputy Secretary
James Rzepkowski, Assistant Secretary
Monitor’s Purpose

The purpose of the Workforce Innovation and Opportunity Act (WIOA) monitoring is to ensure the integrity of the WIOA system and assess the compliance with applicable laws and regulations, and to identify successful methods and best practices that serve to enhance the financial system and internal controls of LWDA areas.
Focus Areas for LWDA

- Title IB: Adult Program
- Title IB: Dislocated Worker Program
- Title IB: Youth Program
- Title II: Adult Education Family Literacy Act
- Title III: Wagner-Peyser Employment Services
- Trade Adjustment Act
MONITORING PROCESS

End Cycle Visit Follow-up

Plan Visit & Notification to LWDA

Report, Technical Assistance & CA Evaluation

Desk Review

Comprehensive Onsite Review
WHAT WE DO?

- Every year monitors create a schedule based on location of when they will visit each of the twelve regions.
- Notifications are sent out in advance of their arrival date as well as a checklist of items that will be reviewed on-site.
- Monitors visit each site twice a year and conduct random check-ins as a courtesy.
The WIOA fiscal team and the program team collaborate with the goal to provide more data sharing between the two activities.

Another goal is to accomplish a more inclusive approach to monitoring and technical assistance.
Desk Monitoring

- Desk Monitoring consist of analyzing existing data such as required monthly/quarterly financial reports, contracts, budgets, current Local WIOA Plans, Resource Sharing Agreements, MOUs, Grant Agreements, Other Partner Agreements, MWE data, FTP files and prior audits and monitoring reports. The desk reviews may include telephone and/or e-mail contacts with the LWDA under review or any others that may have relevant information that may impact the desk review. The Monitor will provide on-site technical assistance as a result of issues disclosed during the desk review process.
## RISK ASSESSMENT TOOL

<table>
<thead>
<tr>
<th>Risk Areas</th>
<th>Potential risk</th>
<th>Over time (3yrs) the Aggregate of Actual Findings</th>
<th>Suggested Actions</th>
<th>Required Actions</th>
<th>Action to Be Taken By DLLRDW/AL</th>
<th>Action to Be Taken By Local Areas</th>
<th>Current Number of Findings</th>
<th>Numbers of Required Actions</th>
<th>Numbers Of Suggested Actions</th>
<th>Total Number of Occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration of WIOA Funds and/or Recent change in grant Recipient</td>
<td>Low</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>None</td>
<td>None</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Any major Personnel Changes (i.e. Executive Director, Fiscal Manager that could impact negatively in the administration &amp; management of the grants and decision making)</td>
<td>Moderate</td>
<td></td>
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</tr>
<tr>
<td>Any Qualified Audit Report Findings: This is a situation where auditors were unable to issue an unqualified opinion, ongoing concern</td>
<td>HIGH</td>
<td></td>
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</tbody>
</table>

For Risk: Low Risk: Moderate Risk: High Risk: Extremely High Unacceptable Risk
Onsite Monitoring

- Onsite Monitoring consist of a Formal on-site monitoring visit conducted annually to determine local area’s compliance with program requirements. On-site monitoring will consist of in-depth interviews with administrative and program staff using formal monitoring instruments as guides. It will also consist of the examination of sample case files for each program that provides client services. A list of files needing review will be submitted to all regions the day of the visit via hand-delivery.

- Resources used to conduct the review are: Maryland Workforce Exchange, Participant Files, Fiscal files that include invoices, Timesheets, financial reports, TEGLs, federal and state policies, assurances, local plans and policies. GUIDANCE USED: TEGLs, TENs, Uniform Guidance, Federal Regulation, State and Local Policies.

The monitor will conduct a walk-through to ensure the following:

- EO is the Law Posters in plain sight, centrally located, in required languages; state and local EO Officer contact information; Literature present; EO tagline (inserted and correct); TTY/TDD or Relay Service number when phone number is listed; Accessibility; Disability entrance signage; entrance; parking lot Accessible stations; and Assistive Technology functionality.
Entrance Conference

- The Comprehensive On-site review begins with the State of Maryland DWDAL Monitor’s arrival and observation of the site’s triage system; making sure the appropriate federal signs are visible by participants and a kiosk with WIOA, Veteran, and Registered Apprenticeship information is available. Before the conference, the Monitor will confirm with LWDA Program Manager or Director that his/her office received notification, staff is aware of participation and requested information prior to meeting is complete and unchanged. Next, during this conference, the monitor will introduce their role to the LWDA/One Stop staff, and remind everyone why the review is being conducted and what will be done. At that time, monitors will review the grantees current organizational chart to determine key personnel and match them with team members if the grantee staff is present.
FISCAL MONITORING SCOPE OF WORK

A. Review the grantee’s latest external audit report – no negative findings

B. Review the grantee’s previous fiscal monitoring report- no negative findings

C. Grantee Financial Management

D. Grantee Obligational Control of US DOL ETA funds

E. Grantee Fiscal Oversight of US DOL ETA sub-recipients

F. Cash Management

G. Procurement

H. Internal Controls
Name of LOCAL WORKFORCE AREA

I. Grants Monitored:

II. Open Grants:
✓ Py15 Fy16
✓ P00P02FR001-B WIOA Youth OR P00P92AB035-WIOA

III. STATE MONITOR: Marsha Harris

IV. Date of Review: March 06, 2017 through March 09, 2017

V. Date of Draft Report: April 17, 2017

VI. LWDA Staff Interviewed:

VII. GRANT PERIOD COVERED: July 01, 2016 Through December 31, 2016

VIII. Monitoring Purpose:

IX. Scope Of Monitoring:

X. TOPICS COVERED-Summary: (I.E. Last Year Single Audit Findings; Prior Year Fiscal Monitoring Required Action; Financial Management 200.302)
TOPICS COVERED CONT’D…

- OBLIGATION CONTROL 200.303; CASH MANAGEMENT; PROCUREMENT 200.318-326; Policies and Procedures;

- SUGGESTED ACTIONS

- REQUIRED ACTIONS

- FINDINGS

- ACTION TO BE TAKEN BY THE LOCAL AREA
- ACTION TO BE TAKEN BY DLLR/DWDAL

- OBJECTIVE CONCLUSION: Based upon my review, DWDAL has determined…

- MET OBJECTIVES(?):
## SCOPE OF PROGRAM MONITORING

<table>
<thead>
<tr>
<th>Types of Monitoring</th>
<th>Comprehensive – Fiscal and Program</th>
<th>End Cycle Monitoring Follow-up</th>
<th>Data Validation</th>
<th>Equal Opportunity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frequency</td>
<td>Once a year</td>
<td>Once after Program &amp; Fiscal year ends</td>
<td>1 time Program &amp; Fiscal Year ends</td>
<td>Once a year</td>
</tr>
<tr>
<td>Technical Assistance</td>
<td>On-going</td>
<td>On-going</td>
<td>NA</td>
<td>On-going</td>
</tr>
<tr>
<td>Number of Regions</td>
<td>12 regions</td>
<td>12 regions</td>
<td>Randomly selected</td>
<td>All</td>
</tr>
<tr>
<td>Programs reviewed</td>
<td>WP, Adult, DW, Youth &amp; AE, TAA (qrtly) and Corr. ED(TBD)</td>
<td>Adult, DW, Youth &amp; AE</td>
<td>Adult, DW, Youth &amp; SCSEP, NEG</td>
<td>All</td>
</tr>
</tbody>
</table>
PROGRAM REVIEW - QUESTIONNAIRE

- General Information
- Monitoring Details (Contact, titles, dates, area)
- American Job Center Information

- Maryland WIOA Required Partners including Additional WIOA Programs as determined by the Governor
- Maryland WIOA Required Partners
- Additional Partners
- Roles and Responsibilities
- Cross Training

- American Job Center Operations
- MOU (WIOA sec. 121 (c))
PROGRAM QUESTIONNAIRE

- One Stop Operator, WIOA sec. 107(d)(10)
- Policies and Procedures (TEGL 04-15, p.7)
- Monitoring and Oversight (WIOA sec. 107(d)(8))

- One Stop Delivery System (WIOA sec. 121(e))
- Flow and Access
- Universal Access
- Referrals Among Partner Programs and Other Resources

- Priority Populations
- Functional Integration (TEGL 04-15 pp.6-7)
- Career Services
- Training Services WIOA sec. 121(e) (1)(B) and (C)
- Partner Program Access WIOA sec. 121(e)(1)(D)
PROGRAM QUESTIONNAIRE CONT’D

- Programs
- Adult and Dislocated Worker
- Youth
- Youth Program General Information
- Youth Reporting and Compliance
- Youth Program Elements
- Youth Vendor Information
- Wagner-Peyser
- RESEA/ROW
- Trade Adjustment Assistance
Local Area: ___________________________  Date: ____________________

I. Participant Information:

<table>
<thead>
<tr>
<th>Name:</th>
<th></th>
<th>Eligibility:</th>
<th>Participation:</th>
<th>Closure:</th>
<th>Exit:</th>
</tr>
</thead>
<tbody>
<tr>
<td>State ID #:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Program Dates:</td>
<td></td>
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</tbody>
</table>

II. Dislocated Worker Eligibility and Enrollment Documentation:
III. Other Individual Criteria

IV. Career Services (no sequence requirement): TEGL 19-16

V. Training Services

VI. Supportive Services (WIOA Sec. 134(d)(2)

VII. Follow-Up Services

VIII. Other
Exit Conference

- The Monitor schedules an exit conference to go over a discussion draft of the report. The purpose of the exit conference is to communicate monitoring results to the grantee management and to obtain management’s comments on proposed findings and recommendations before the formal draft report is issued.
SUB-RECIPIENT MONITORING

End Result

- Draft Report
- Final Report
- Findings
- Corrective Action
- Time to Respond
- Entrance and Exit Conference
**TECHNICAL ASSISTANCE** – The log is used to capture ongoing discussions of issues and concerns of the local area.

<table>
<thead>
<tr>
<th>Assistance Logistics</th>
<th>Type of assistance</th>
<th>Description of Assistance</th>
<th>Assistance Provided to:</th>
<th>Outcome of Assistance (use all available lines to include notes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date: 9/10/2015</td>
<td>Training</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Location: On-site/Off-site</td>
<td>Monitoring</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Name of TA Provider:</td>
<td>Service Delivery</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Staff:</td>
<td>Other: TA</td>
<td>Correct Finding #8 Youth</td>
<td>Discussed alternative methods for eligibility</td>
<td>Pending – unable to resolve</td>
</tr>
</tbody>
</table>
CHALLENGES

• STAFF TURNOVER

• INCONSISTENT /POORLY WRITTEN POLICIES

• LACK OF POLICY(IES)

• TRAINING

• LACK OF KNOWLEDGE IN SPECIFIC AREA OF REQUIRED EXPERTISE

• SCHEDULING OF SITE VISITS

• OBSERVATION BIAS (People put their best foot forward when they know they are being observed, leading to an assessment of abnormal information.)
The State of Maryland requires that prompt corrective action be taken if any substantial violations are identified and must impose sanctions if a sub-recipient fails to take required corrective action. The State of Maryland will ensure that appropriate corrective action is taken within 1 month after receipt of the monitoring report of noncompliance with Federal laws, statues and regulations. **Fiscal Controls/Sanctions:** In the event of a sub-recipient's failure to take required corrective action for substantial violation of standards, sanctions and fiscal controls will be imposed according to WIOA sections 184(b) and (c). These actions may be appealed to the Secretary of Labor in accordance with section 184(b)(2).
Questions!

Thank You
Maryland Department of Labor, Licensing and Regulation
Division of Workforce Development and Adult Learning
Contact Information

410.767.2173

Please submit questions to tanya.washington@maryland.gov.

For questions directly related to specific monitors please forward to:
Program: maryellen.branham@maryland.gov; gregory.adams@maryland.gov.
Fiscal: marsha.harris@maryland.gov; alphonsus.ogbaekwe@maryland.gov;