

St. Louis County Workforce Development
Sub-State Monitoring Policy and Procedures

OWD Issuance 12-2019; Statewide Sub-state Monitoring Policy

WIOA mandates program oversight responsibilities that, in partnership with the Chief Elected Official (CEO), are inherent functions of the Local Workforce Development Board (Local WDB) serving an LWDA.

The local board, in partnership with the chief elected official for the local area, shall—

(A)(i) conduct oversight for local youth workforce investment activities authorized under section 129(c), local employment and training activities authorized under subsections (c) and (d) of section 134, and the one-stop delivery system in the local area; and

(ii) ensure the appropriate use and management of the funds provided under subtitle B for the activities and system described in clause (i); and

(B) for workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcome under section 116.

1. **Responsible Representative**—Each Local WDB must identify who will perform Sub-State monitoring oversight. There must be a local policy that outlines how the identified person is selected
2. **Accountability**—An annual report must be submitted to the Local WDB and CEO each program year so they can fulfill their oversight responsibility.
3. **Compliance and Performance**—The annual report must include a review of the sub-recipients compliance with the terms and conditions of their respective scope of work. Other areas to cover in monitoring reports are performance, the adequacy of assessment, activity and service planning, partner coordination to meet needs, and outcomes. All identified problems must be promptly and appropriately resolved.
4. **Compatibility**—Policies must demonstrate that the Local WDB's programmatic and operational oversight systems effectively measure compliance in a manner compatible with WIOA regulations and DWD policies.
5. **Quality Assurance**—Policies must include a review of program quality and provide for continuous improvement of service delivery. LWDA monitoring should include a review of issues previously cited in Federal, State and/or local reviews. A written determination should state whether corrective measures taken to resolve those issues have proven effective.

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6. Methodology and Target Universes—Monitors must use random-sampling techniques in participant file reviews to test the compliance in every funding stream for which the Local WDB has a contract with DWD.

When monitoring WIOA Adult and Dislocated Worker participant records, combine the two funding streams, then sample by service. Each Program Year, the Local WDB must monitor a separate statistically valid sample of Adult and Dislocated Worker participants enrolled in each of the following services:

- Classroom Training
- On-the-Job Training
- Work experience/Internships/Apprenticeship
- Supportive Services/Needs-related payments
- Any other services that result in a direct payment being made to or on behalf of the participant

Depending on the size of each record set requiring review, the corresponding number of sample records shown below, at a minimum, must be examined. These guidelines are applicable for every review.

<u>Record Set Size</u>	<u>Sample Size</u>
1-200	69
201-300	78
301-400	84
401-500	87
501-1,000	96
1,001-2,000	100
2,001-10,000	105

Locally, Sub-state Monitoring begins in September each year. It begins with the desk-top monitoring of the programs.

Step 1:

To prepare for desk-top monitoring portion of the Sub-State Monitoring you should follow these steps:

1. Use the state case management system to retrieve the case load lists of all programs
2. Randomly select participants to review according to the required sample size and services outlined within DWD Issuance 15-2017 and above.
3. Using an Excel or Access spreadsheet is highly recommended to keep track of your monitoring results
4. Perform the desk-top monitoring according to the parameters outlined in DWD Issuance 15-2017 and above.

Step 2:

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In tandem, once the participant records are selected, letters are sent to the sub-recipients announcing the pending monitoring. The steps are as follows:

1. Select the dates the participant records should be submitted for each program
2. Select the dates the record review will begin for each program
3. Prepare the letters, on Human Services letterhead, for each sub-recipient advising them of the upcoming sub-state monitoring. See the attached example of the letter.
4. Send, via email, the appropriate letter to the respective directors of each sub-recipient.

Step 3:

After the letters are sent, the next correspondence is the email requesting the participant records. The steps are as follow:

1. Use Excel or Access to create a list of the participants. The list should include their state case management system state id number, last name and first name.
2. Email the respective lists to the appropriate sub-recipient one week prior to the due date.

The participant records should be submitted on or before their due date. At that time, monitoring of the participant record can begin.

Step 4:

It is important to remember that you should try to resolve all findings while you are monitoring. Waiting until the end is not optimal, allows the sub-recipients to repeat the errors and places the LWDA at risk of State and/or Federal findings.

Step 5:

Once the participant desktop and record reviews are finished, memorandums are sent to the Director of Compliance.

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