STATE OF MARYLAND
DLLR
DEPARTMENT OF LABOR, LICENSING AND REGULATION

Division of Workforce Development and Adult Learning (DWDAL)

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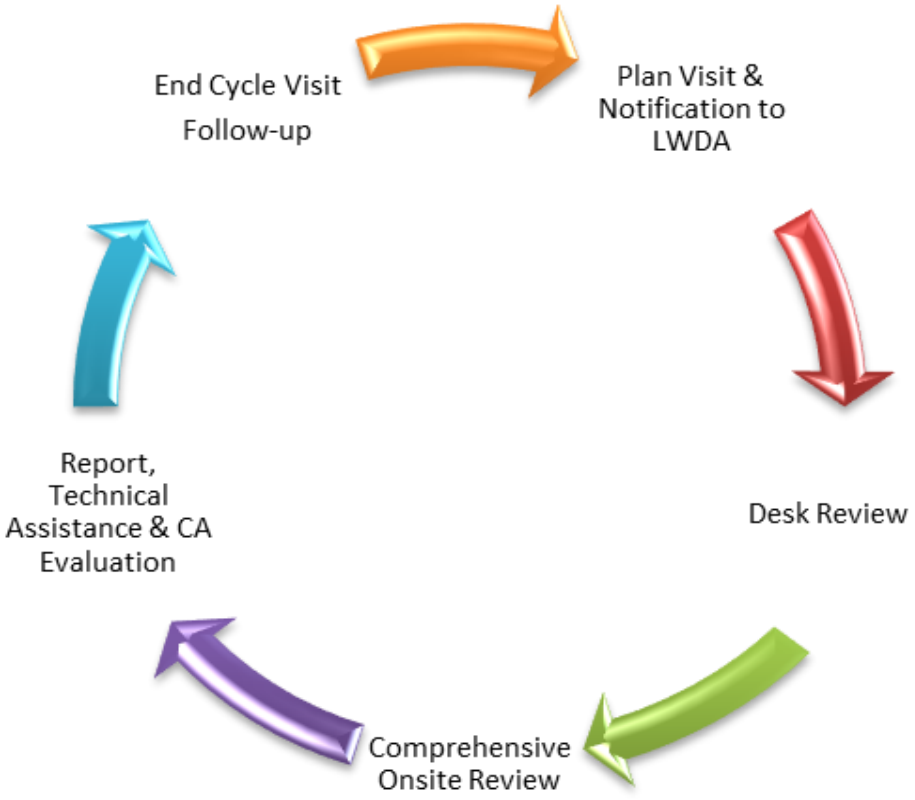
Monitor's Purpose

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



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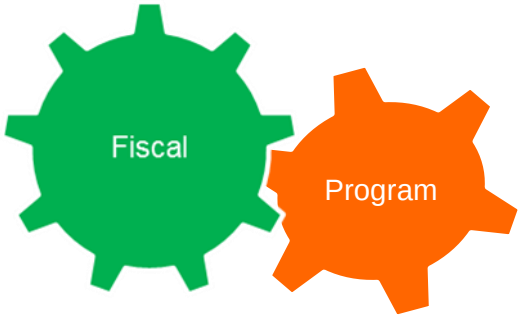
WHAT WE DO?

- 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.

Fiscal & Program Monitoring Collaboration

- 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

Risk Areas	Potential risk	Over time (3yrs) the Aggregate of Actual Findings	Suggested Actions	Required Actions	Action to Be Taken By DLLR/DWDAL	Action to Be Taken By Local Areas	Current Number of Findings	Numbers of Required Actions	Numbers Of Suggested Actions	Total Number of Occurrences
Low Risk: Moderate Risk: High Risk: Extremely High Unacceptable Risk										
Administration of WIOA Funds and/or Recent change in grant Recipient	Low	0.00	0.00	0.00	None	None	0.0	0.0%		0.0
Any major Personnel Changes(i.e. Executive Director, Fiscal Manager that could impact negatively in the administration & management of the grants and decision making	Moderate									
Any Qualified Audit Report Findings: This is a situation where auditors were unable to issue an unqualified opinion, ongoing concern	HIGH									
Any Fiscal Monitoring Findings: 1). Missing invoices 2). Failure to submit audit report 3). Untimely reporting of QSR										

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

FISCAL MONITORING DRAFT REPORT - FORMAT

Name of LOCAL WORKFORCE AREA

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

I. STATE MONITOR: Marsha Harris

II. Date of Review: March 06, 2017 through March 09, 2017
III. Date of Draft Report: April 17, 2017

IV. LWDA Staff Interviewed:

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

VI. Monitoring Purpose:

VII. Scope Of Monitoring:

VIII. TOPICS COVERED-Summary: (I.E. Last Year Single Audit Findings; Prior Year Fiscal Monitoring Required Action; Financial Management 200.302

Fiscal Monitoring Report Format cont'd

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

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

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

Participant File Review – Dislocated Worker Topic Examples

Local Area: _____ **Date:** _____

I. Participant Information:

Name:				
State ID #:				
Program Dates:	Eligibility:	Participation:	Closure:	Exit:
Co-enrolled programs				

II. Dislocated Worker Eligibility and Enrollment Documentation:

Participant File Review – Dislocated Worker cont'd

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

End of Monitoring

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.

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

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.)

COMPLIANCE & ACCOUNTABILITY FOR LOCAL AREAS

- Year 1: Mandatory Technical Assistance
- Year 2: Mandatory Technical Assistance
- Year 3: Reorganization, prohibit specific providers, other potential actions

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

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

For questions directly related to specific monitors please forward to:

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Fiscal: marsha.harris@maryland.gov; alphonsus.ogbaekwe@maryland.gov;

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