

Attachment 4

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

In accordance with OWD Issuance 11-2021; 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—the St. Louis County WFD Compliance Unit will identify will perform Sub-State monitoring oversight.
2. Accountability—A report will be submitted to the Office of Workforce Developments Regulatory Compliance Unit each program year and monitoring will be completed quarterly in all areas described below.
3. Compliance and Performance—The report will include a review of the sub-recipients compliance with the terms and conditions of their respective scope of work, contract, and/or MOU. Other areas to cover are; monitoring reports are performance, the adequacy of assessment, activity and service planning, partner coordination to meet needs, and outcomes. Ensuring that all identified problems are promptly and appropriately resolved.
4. Methodology and Target Universes—Monitors will use random-sampling techniques in participant file and desktop reviews to test the compliance in every funding stream for which the enrollment was completed.

Programs to Monitor include (at a minimum):

- Classroom Occupational Training
- On-the-Job Training
- Incumbent Worker Training
- Job League
- Work experience/Internships/Apprenticeships/Pre-Apprenticeships
- Supportive Services/Needs-related payments/Incentive payments

Sample Size

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

Risk Assessment

Prior to issuing an award under WIOA Title I and annually thereafter, the St. Louis County WFDB will conduct a risk assessment to assess the organizations overall ability to administer and receive Federal funds as required under 2CFR 200.205. The risk assessment outcomes are available to OWD upon request at any time. Risk assessment will be completed every six months and will be based on the successful completion of sub-recipient contractual obligations.

One Stop Operator

The St. Louis County WFDB will conduct an annual review of their one-stop operator to ensure compliance with the requirements outlined in 20 CFR 678.620, as well as responsibilities outlined in the current MOU/RFP/Contract.

Monitoring Structure

Reviews will be conducted quarterly and/or ongoing as determined by operational need. Staff will utilize locally created monitoring tools patterned after OWD's monitoring tools, or a variation of to complete reviews.

Program monitoring may include, but is not limited to:

1. Documentation of participant eligibility and/or priority for the programs and services received;
2. Orientation to services;
3. Signed acknowledgement from the participant that notification of complaint and grievance rights and procedures was received;
4. Justification for the provision of Individualized Career Services or Training services;
5. Method of assessment;
6. Employment planning;
7. Individual Training Accounts including all applicable paperwork/documentation;
8. Work Based Learning including all applicable paperwork/documentation;
9. Appropriateness and accuracy of participant payments (i.e., Supportive Services)
10. Appropriate data entry;
11. Posting of outcomes, including the attainment of a degree or certificate, measurable skill gains, and

- any supplemental employment data;
- 12. Examination of historical change requests;
- 13. Compliance issues cited in prior federal, State, and local reviews;
- 14. Determination if prior corrective measures have proven effective.

Additional youth monitoring review items:

- a. New WIOA eligibility criteria and barrier documentation
- b. Current Out of School Youth percentage expenditure rate requirement
- c. Work based learning with educational component twenty percent (20) expenditure requirement
- d. In School Youth limit five (5) percent enrolled with “requires additional assistance” barrier
- e. Over Income exception limit five (5) percent

Data Element Validation (DEV)

The St. Louis County WFDB JobStat Representative will conduct quarterly Data Element Validation (DEV) reviews to ensure the integrity of performance outcomes. The DEV will be performed as outlined in OWD Issuance 07-2020. This review is to verify that the data elements reported by the St. Louis County WFDB are valid, accurate, reliable, and comparable across programs. Monitors will use random-sampling techniques when selecting active and exited files from the most recent quarter that ended to review.

Sub Recipient Financial Monitoring Procedures

1. Financial monitoring review of sub-recipients will be conducted quarterly to ensure fiscal integrity, the adequacy of internal controls and the reliability of financial management systems in reference to sub-awards. The financial monitoring review includes the following areas at a minimum:
 - a. Cost allocation processes/Indirect Costs
 - b. Internal controls
 - c. Procurement processes
 - d. Audit Resolution/Management Decision
 - e. Financial Reporting
 - f. Source Documentation
 - g. Cash Management
 - h. One-Stop Operator adherence to RFP/Contract

Equal Opportunity Monitoring

The Local Equal Opportunity Officer will conduct quarterly on-site EO Monitoring which include, at a minimum:

1. Ensuring compliance with the nondiscrimination and equal opportunity provisions of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan, and negotiating, where appropriate, with a recipient to secure voluntary compliance when noncompliance is found under §38.91(b).
2. Quarterly monitoring the compliance of recipients with WIOA section 188, 29 CFR Part 38 and the Missouri Nondiscrimination Plan, including a determination as to whether each recipient is

conducting its WIOA Title I-financially assisted program or activity in a nondiscriminatory way.

At a minimum, each annual monitoring review required must include:

- i. A statistical or other quantifiable analysis of records and data kept by the recipient under §38.41, including analyses by race/ethnicity, sex, limited English proficiency, preferred language, age, and disability status;
- ii. An investigation of any significant differences identified in paragraph (b)(1) of this section in participation in the programs, activities, or employment provided by the recipient, to determine whether these differences appear to be caused by discrimination. This investigation must be conducted through review of the recipient's records and any other appropriate means; and
- iii. An assessment to determine whether the recipient has fulfilled its administrative obligations (for example, recordkeeping, notice and communication) and any duties assigned to it under the Missouri Nondiscrimination Plan.

Monitoring Reports to LWDB and County Executive

The Compliance Unit will submit annual reports each Program Year to the Local WDB and County Executive.

1. The following Reports will be presented at a Board meeting (to the LWDB) and documented in minutes:
 - i. One-Stop Operator monitoring
 - ii. Programmatic monitoring
 - iii. Financial monitoring
 - iv. Equal Opportunity monitoring
 - v. Performance reviews
 - vi. Special initiatives/grants

The St. Louis County Compliance Unit will submit annual reports for Financial, Programmatic, One Stop Operator and EO monitoring each Program Year to their sub-recipients. Annual reports will be issued by June 30th of each Program Year. Each report will be addressed to the sub-recipient to include but not limited to; date issued, the timeframe of monitoring, all identified issues, the corrective action (if any), along with the explanation of the required corrective action (if any), and a deadline for completion of the corrective action (if any).

If you have any questions regarding this policy please feel free to contact the Compliance Director for St. Louis County Workforce Development at: Dr. Tiffany Manning; tmanning@stlouiscountymo.gov.