



January 22, 2019

GOVERNING BOARD

LARRY CARR
Councilmember
City of Sacramento

PATRICK KENNEDY
Board of Supervisors
County of Sacramento

DON NOTTOLI
Board of Supervisors
County of Sacramento

SOPHIA SCHERMAN
Public Representative

JAY SCHENIRER
Councilmember
City of Sacramento

KATHY KOSSICK
Executive Director

925 Del Paso Blvd., Suite 100
Sacramento, CA 95815

Main Office
(916) 263-3800

Head Start
(916) 263-3804

Website: <http://www.seta.net>

TO: Program Managers, SETA-Funded Service Providers,
Site Supervisors, Sacramento Works Job Centers of California

FROM: Kathy Kossick, Executive Director

SUBJECT: Monitoring Policy for Workforce Development Programs
– WIOA Directive #**WDD19-1**

Purpose

This directive provides policy guidance and establishes procedures for SETA staff to follow in conducting effective program monitoring, providing technical assistance to ensure program quality and fiscal integrity, and rendering accurate and comprehensive reports of monitored activities.

Effective Date

This directive is effective on the date of issuance.

Background

SETA is required by federal regulations to establish and implement monitoring policies and procedures to ensure the following:

- Compliance with uniform cost principles described in Offices and Management and Budget (OMB) circulars
- Compliance with appropriate uniform administrative requirements for grants and agreements for the type of entity receiving funds
- Compliance with the Workforce Innovation and Opportunity Act (WIOA), including WIOA Section 188, Nondiscrimination and Equal Opportunity, requirements, and other applicable federal, state and local regulations and policies
- Compliance with applicable Refugee Resettlement Program federal, state and local requirements, and Sacramento County’s 3-year Refugee Plan
- Compliance with Community Services Block Grant (CSBG) and SETA’s Community Action Plan

- Compliance in the procurement of goods and services from vendors, including federal, state, and local requirements
- Fiscal Integrity
- Compliance with all applicable subgrant/delegate agreement special conditions, stipulations, and assurances

POLICY AND PROCEDURES

Staff will monitor programs in accordance with the provisions contained herein.

Service providers will be monitored on-site no less than once a year during the term of the contract. Staff will conduct a monitoring review of contractual, programmatic and/or fiscal areas.

- The monitoring review will provide service providers with an objective evaluation of the program that informs service providers of areas where there are deficiencies and areas where improvements can be made. The desired result is to enhance program services to the customer by coordination and collaboration with the service provider and SETA. Specific information to be provided includes:
 - Provision of, or connection to, technical assistance regarding contractual, fiscal, and/or programmatic requirements
 - Significant areas of noncompliance and recommended corrective action plans
 - Assurance that subrecipients/program providers comply with federal and state requirements regarding nondiscrimination and equal opportunity
 - Identification of timelines identifying key dates for corrective action, including when plans will be adopted and implemented
 - Follow-up timelines on corrective actions and any additional, pertinent information

This policy establishes procedures for monitoring SETA subrecipients and program providers. Currently, fiscal monitoring is completed by SETA's Fiscal Department and program monitoring is completed by SETA's Workforce Development Department. The fiscal and program monitors will work cooperatively to share program information and identify fiscal/ program deficiencies.

Monitoring Process -

Scheduling Site Visit

Notification of visit and/or review will be included in both a telephone call and a confirmation letter with the agreed upon date and time of visit. The confirmation letter will be sent to the service provider approximately two weeks prior to the visit and identify the following:

- Date(s)
- Time(s)
- Location(s) of review
- Programs, components and/or areas and materials of review
- Documents to be completed by the service provider before the onsite visit

Desk Review

Prior to the monitoring visit, a Desk Review will be conducted. The Desk Review will consist of a comprehensive review of current program information and reports on file including the subrecipient agreement and any performance information.

The Desk Review may include, but is not limited to, a review of fiscal data, previous monitoring reports, corrective action, contract information, correspondence, SacWorks case management data and the self-reported subrecipient information. The data will be analyzed to determine areas of strengths and weaknesses that will be reviewed in the field during the on-site monitoring visit. Information obtained because of the Desk Review will also assist in focusing and, if necessary, expanding the scope of review in specific areas.

Review of the contract will be conducted with special attention to the Work Schedule, Program Standards, Program Performance Overview (PPO), Program Planning Summary (PPS), Outcome Goals and Objectives, and Budget and Cost Allocation, whichever are applicable.

Performance summaries will be reviewed for planned versus actual performance and compared for consistency and accuracy with the data obtained from the PPO, PPS, Outcome Goals and Objectives, SETA Management Information System (MIS), or from the service provider during the on-site visit.

Onsite Visit

The on-site visit will permit staff to verify data and information obtained from the Desk Review that may lead to identification of areas of non-compliance. The Review will be conducted using a standard review guide. The process and major areas of focus during the on-site review are:

- Entrance interview – Staff will conduct an entrance conference with the service provider’s Program Administrator or designee to convey the purpose and focus of the visit and to inform the service provider of specific tasks to be completed during the visit.
- Evaluation of Performance – Staff will review and determine the degree of contractual compliance in meeting program performance goals and identify the causes in those areas where noncompliance has occurred.
- Records Review – Validation of information from the Desk Review will be completed by review of administrative records, contract files, fiscal records, participant files, and other records deemed to be pertinent to the review.
- Interviews – Interviews may be conducted with the service provider staff, participants and employers to obtain information about program administration, operations, and the quality of service.
- Exit Conference/Interview – An exit conference will be conducted with the service provider’s program administrator or designee to discuss the results of the monitoring review, identify required corrective actions, determine time-line for completion and offer technical assistance.

Technical Assistance

Technical assistance needs identified during the onsite visit will be addressed and scheduled as soon as possible with the appropriate SETA staff. Subrecipients/service providers shall be advised that technical assistance is available on an ongoing basis. Methods of providing technical assistance may include the following:

- Immediate assistance: SETA monitor provides brief clarification to the subrecipients on contracted/required services
- System-wide: SETA staff with expertise in the subject area will provide assistance in utilizing or understanding system-wide requirements such as SacWorks, MIS, case management, etc.
- Specialized: SETA's training team develops or procures workshops for subrecipients on specific operational requirements

Monitoring staff will follow-up on technical assistance referrals by contacting the service provider or SETA technical assistance staff.

Review of Summaries and Reports

A monitoring report will be developed reflecting the analysis of the data and information gathered through the desk review and the onsite monitoring visit. The report will identify in need of improvement or areas where technical assistance is needed, and provide the service provider with an opportunity to amend, modify or correct any problem area identified by the monitor. The Deputy Director, Regional Managers and the Refugee Coordinator will receive copies of Monitoring Reports. The service provider must report the corrective action(s) taken within the designated period. This may necessitate subsequent onsite visits to verify action taken.

The monitoring report will consist of information specific to the program and contract and will be retained for three years from the date of submission of the final expenditure reports regarding funding sources monitored. The report may identify review results including, but not limited to, the following:

- **Fiscal Management** - Evaluation of appropriate actions and documentation of all fiscal matters pertaining to the contract and/or program
- **Program Management** - Assessment of the overall management of the program and systems
- **Program Performance** - Assessment of planned performance or provision of services to date
- **Findings** – Areas requiring corrective action or process and a specific date for implementation
- **Corrective Actions Required** - Corrective actions are stipulated immediately following a finding of an obvious or evident violation(s)
- **Recommendations** – Included to assist the provider's resolution, performance improvement or service enhancement for program participants

Corrective Action

Corrective action requests should immediately follow a finding of obvious violation of law, regulation or policy, or a breach of contract. The request for corrective action will identify areas of noncompliance and will include the timeline by which a corrective action plan will need to be submitted for approval to SETA. A "draft" copy of the request for corrective action will be provided to the assigned SETA Manager, as well as the Monitoring/Evaluation Supervisor, for review/discussion with the SETA monitor five days prior to issuance to the subrecipient/service provider.

Upon receipt of the corrective action request, the subrecipient/service provider will have approximately 10 working days to respond with a corrective action plan that includes action that will be taken to correct the deficiency or area of noncompliance, and the timeline by which correction/improvement will be achieved. Monitoring staff will determine if the corrective action plan

is sufficient. A subrecipient's/service provider's corrective action plan will be included in the formal monitoring file.

If it is determined that the plan is insufficient to remedy deficiencies, the SETA monitor will recommend additional actions that can be incorporated into the corrective action plan to fully address the deficiencies. Once all actions are agreed upon, the subrecipient/service provider will provide an updated corrective action plan to the SETA monitor. Monitoring will notify the subrecipient/service provider of the corrective action plan final approval/denial, and will place a copy for in the applicable file.

A subrecipient's/service provider's failure to respond to the corrective action request may result in additional action, including the following:

- Withholding of payments or reimbursements until provision of required documentation of corrective actions has been implemented and reviewed by monitoring staff
- Notification of unresolved performance deficiencies and questions, or disallowed costs
- Termination of contract

Follow-up

Follow-up will be conducted following receipt and approval of a corrective action plan to ensure the subrecipients/service providers have initiated appropriate action. This may necessitate subsequent onsite visits. The SETA monitor will inform Program Managers and Program Supervisors of progress made resulting from the implementation of a correction action plan. Once a subrecipient/service provider is placed on formal corrective action, the corrective action is continued for the duration of the program year. Corrective action will be closed at the end of the program year and the final report will indicate that deficiencies are either resolved or unresolved.

ACTIONS

Bring this directive to all relevant parties.

INQUIRIES

For questions on this policy directive contact Michelle O'Camb at Michelle.Ocamb@seta.net.