

# Ozark Region Sub-state Monitoring Policy

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Ozark Region

# Ozark Region Sub-State Monitoring Policy-2022

## Overview

The Ozark Region is comprised of the following counties: Christian, Dallas, Greene, Polk, Stone, Taney, and Webster. Oversight of workforce activities for the Region is the responsibility of the Council of Local Elected Officials (CLEO), made up of the Presiding Commissioners of each of the seven counties, and the Workforce Development Board (the Board).

In conjunction with the Board, the CLEO has appointed the City of Springfield, Department of Finance, as the fiscal agent of the Workforce Innovation and Opportunity Act (WIOA).

WIOA funding streams include funds for Adult, Dislocated Worker and Youth services. Adult, Dislocated Worker, and Youth services are provided by the City Department of Workforce Development, as well as the Career and Business Services. Currently, there are no subcontracts. Wagner-Peyser is a separate funding stream that involves Labor Exchange and Employment and Training and these services are also available at the Job Center.

The City Department of Public Information and Civic Engagement serves as the One-Stop operator as selected by the Board through a competitive process. Personnel performing duties for the One-Stop Operator are housed in the One-Stop.

Monitoring and oversight is conducted for each of the programs cited above.

## Responsible Representative

Recognizing the need for local monitoring, the Department of Workforce Development proposed the addition of a Compliance Coordinator position. This was approved by City Council in June of 2009. In the organizational structure, this position has direct reporting to the Director. A second Compliance Coordinator position has been added as of March 2016. A third Compliance Coordinator was added in 2021. A formal job description outlines the overall duties assigned to the Compliance Coordinators. Delineation of duties is determined by the Director.

## Accountability

According to the Board's Bylaws, the Planning & Oversight Committee has responsibility to "review and evaluate project/program performance and outcomes and recommend performance-related changes and/or modifications as necessary." Any concerns, negative performance, or monitoring issues shall be brought to the attention of the Committee for discussion and/or action.

## Compliance and Performance

Program reports shall be provided to the Director to be discussed at the Planning & Oversight Committee. A yearly Sub-State Monitoring report shall be provided to the Board and to the Council of

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Local Elected Officials at their respective meetings. Reports shall be developed according to established guidelines and according to WIOA and OWD requirements.

## Compatibility

Monitoring and oversight of programs are conducted according to WIOA regulations and following the Office of Workforce Development issuances.

## Quality Assurance

It is the imperative that there is continuous review of programs, policies, and services to ensure quality at the Missouri Job Center(s). \*Quarterly monitoring reviews shall be conducted to ensure all programs are monitored at least once per year. Any issues noted shall be immediately addressed with the supervisor of the program. If necessary, a written corrective action plan shall be established.

## Risk Assessment

A risk assessment tool has been developed to assess the ability to administer the Federal funds as required under 2 CFR 200.205. The assessment covers the organization's ability to operate the programs Financial stability, history of operations, quality of management, history of performance, timeliness of compliance, reports and findings from State and Federal audits shall be considered. The risk assessment shall be conducted annually and presented to the Board.

## Methodology

The Region shall follow the established guidelines in conducting file reviews according to the issuance for "Target Universes" for each of the WIOA funding streams. As noted in Issuances 12-2019, the Adult and Dislocated Worker programs shall be combined and a separate statistically valid sample will be chosen for each of the following:

- Classroom Training;
- OJT;
- Work experience/Internship/Apprenticeship;
- Supportive Services/Needs-related payments; and
- Any other services that result in a direct payment being made to, or on behalf of, a participant.

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<u>Universe</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

In addition, specialized programs will be monitored according to the scope of work and/or regulations established by the specific program.

## Financial Monitoring

The City of Springfield Finance Department is the designated fiscal agent and grant sub recipient for the Ozark Region. Workforce Development services and federal program implementation are delivered by the Department of Workforce Development/Missouri Job Center.

Financial Monitoring is conducted by the City of Springfield Department of Finance staff members, who are located at the Job Center. Fiscal integrity is paramount for the City and there are rigorous procedures in place to ensure accountability. Finance staff review budgets, track expenditures, and review procurements for each of the WIOA programs. Source documentation is kept and all cash management procedures are followed. The City procures the services (currently) of BKD for annual audits of all departments.

In addition to the steps in place by the City’s Department of Finance, the Board’s Finance Committee regularly reviews budget reports, approves annual budgets, and acceptance of new funding. All financial and program activities are delivered according to and at the pleasure of the Board and Chief Elected Officials Council. In addition, the activities support the local plan and strategic goals set forth by the Workforce Development Board.

## Specific Program Monitoring

### All WIOA programs

Regardless of program/funding streams, participant records shall be reviewed for the following:

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- Documentation of eligibility and or priority for service
- Orientation to services
- Complaint/Grievance
- Justification for services
- Assessments
- Employment Planning
- ITAs
- Work-based learning
- Appropriateness
- Data entry
- Outcomes, including attainment of degree/certificate/employment data
- Examination of change requests
- Compliance issues cited in reviews
- Determination of prior corrective measures have been proven effective

## Training Services

Training Services are provided through the Skills Team, with the exception of individuals receiving training through the Young Adult program. Reviews shall include both desktop and hard files. During the monitoring, any supportive services granted shall also be reviewed. Monitoring shall be consistent with the universe selection of files and conducted through the utilization of eligibility guidelines, issuances, and local policies.

## Youth (Young Adult) Services

In 2018, the Board chose to bring the Youth program “in-house” and have assigned the City of Springfield, Department of Workforce Development as their agent and operator of the program. Reviews, at a minimum, shall include a review of the fourteen elements and:

- In-school; including 5% limit on “needs additional assistance”
- Out-of-school; including % expenditure requirement
- Eligibility
- Work Experience, including 20% expenditure requirement and work-based learning
- Objective Assessments
- Individual Employment Plans
- Credentials
- Supportive Services
- 5% over income

## Program Monitoring

Program monitoring is conducted annually utilizing the universe sample guidance. A desk top monitoring occurs along with a hard file review that includes review of all required system

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documentation, required eligibility, supportive services, assessments, individual employment plans, and activities, (based on State Issuances, WIOA requirements, local Plan of Service, local policies, and scope of works).

## Specialized Programs/Grants

The following programs shall be reviewed according to the established guidelines, issuances, Scopes of Work, Policy and Contracts.

- Dislocated Worker Grants
- Show Me Heroes
- Jobs League
- Other programs accepted/approved by the Board

## EEO & Confidentiality Monitoring

Monitoring for EEO compliance is the responsibility of the EEO Officer under 29 CFR Part 38, Section 1888 of WIOA and the Missouri Nondiscrimination Plan. Those responsibilities include, but not limited to:

- Serving as the liaison with the State EO Officer
- Monitoring and investigating activities of the operators who receive WIOA Title I financial assistance (One Stop Operators, Operators of Adult/Dislocated Worker/Youth programs, as well as Eligible Training Providers, On-the Job Training Employers, work experience employers and other recipients as defined under 29 CFR 38.44(zz))
- Reviewing written policies for nondiscrimination
- Developing and publishing procedures for processing program complaints and grievances. Implementing and publishing discrimination complaints procedures. Tracking program complaints, grievances, and discrimination complaints. Developing procedures for investigating and resolving program complaints and grievances. Assisting the State EO Officer with investigating discrimination complaints.
- Conducting outreach and education about equal opportunity and nondiscrimination
- Undergo all training to maintain competency of the EO Officer
- Oversee the implementation of Missouri's Nondiscrimination Plan
- Conduct monthly training to job center staff on EO related topics.

Continuous training of staff is of high priority to ensure that staff members are aware of changes in the requirements as well as ensuring consistency in the services to individuals.

The Region follows the State's issuances on Confidentiality, Complaint & Grievances, Sexual Harassment, and Reasonable Accommodations. The Compliance Coordinators are responsible for ensuring that the confidentiality statement is signed for all non-state employees prior to access to the State's database

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system. The State supervisor has responsibility for State staff. In addition, the Compliance Coordinators review hard files to ensure the complaint/grievance documentation is on file for participants.

The EEO Officer and designee have the responsibility for ensuring that each staff member attends any mandatory EEO training and obtaining subsequent documentation, which is kept on file.

## Business Service Monitoring

The Ozark Region has established a Business Service Team. With acceptance of this plan, the following monitoring activities shall be conducted through sample monitoring:

- Review of statewide database-completion of data
- Review of staff-assisted job orders
- Review of employer engagement activities (i.e. number, type, etc.)
- Review of performance against Business Service Plan goals
- Employer satisfaction-review of surveys

## One-Stop Operator

The One-stop operator will be reviewed annually to determine if the Scope of Work is being followed and to ensure compliance with requirements outlined in 20 CFR 678-620. If determined that the One-Stop Operator is not meeting expectations, corrective action will be taken. Review of the One-Stop Operator will be contained within the annual Sub-State Monitoring report, which is submitted to the Board and CLEO.

## Data Validation

A data validation review will be conducted quarterly to verify that performance data elements that have been reported are valid, accurate, reliable and comparable across programs. This review will help identify anomalies and resolve issues that may cause inaccurate reporting. The following data set records will be used as samples for examination:

Exited Record Set Size	Sample Size
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

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## Process

- The Compliance Coordinator(s) will determine the selection of files based on criteria established by State Issuance (Universe sample), scope of work, and/or contract.
- All requested files and documents will be submitted to the Compliance Coordinator(s) with a checklist within two working days for WIOA Program Reviews.
- Upon completion of a review, the Compliance Coordinator(s) will provide a draft report to the Program Supervisor for each program. A meeting will be held with the WIOA Program Supervisor(s), the Compliance Coordinator(s), and any Program Lead to discuss the report prior to submission to the Director. The meeting will reflect the scope of the review, attributes such as outreach, eligibility, case management, follow-up, etc.
- Upon finalization of the report, the Compliance Coordinator(s) will email the review to the Center Director, Assistant Director, and Program Supervisor. The due date for corrections and responses will be included. Staff responses will consist of confirmation of corrections, and any questions that arise will be addressed with the Compliance Coordinator(s) for clarification. Responses to review will include corrections to files and will specifically address the Compliance Coordinator(s) recommendations. Responses will include specific actions, process development or those to be developed with timelines to address issues and to reduce and or eliminate any recurrence. Responses will focus on actions or new processes developed and implemented.
- If the report recommendations of the Compliance Coordinator(s) are not supported, an alternative action or recommendation may be submitted, which will include date of implementation of no longer than 30 days. Future responses will address staff issues and any appropriate action taken. Any request for extension to the due date of Corrections and Responses must be submitted in writing with justification to the Center Director.
- The completed review will be submitted to Workforce Development Board (WDB) Planning & Oversight Committee and/or the Workforce Development Board Youth Committee (dependent upon review).
- An annual report will be provided to the entire WDB detailing the monitoring reviews for the year.

## Communication

Communication is vital to the monitoring program. The Director has assured that the compliance staff shall be included in reviews of all programs at the Center. Open communication between program supervisors and compliance staff, between the Director/Assistant Director and the compliance staff, and between the Board and the compliance staff shall be observed. The compliance staff shall open lines of communication with each of the programs and shall meet with each program staff on a quarterly basis. When changes in policy, program, and/or issuances are received, they shall be forwarded to the compliance staff, who shall ensure they are sent out to the appropriate personnel. In addition, any staff receiving Scopes of Work or changes in contracts shall ensure that these documents are forwarded to the compliance staff for review and inclusion into the monitoring schedule. Compliance staff shall forward any TEGs, Issuances, and/or other notices to appropriate staff upon receipt.



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## Contract Review

The Compliance Coordinators shall review each program-related contract and Scope of Work to determine deliverables and shall develop templates for the program monitoring. These will be maintained in the monitoring folder accessible to the Compliance Coordinators; however, the documents shall be shared with the program staff responsible for the program.

## Security and internal Controls

During the internal review, file access shall be limited to the Compliance Coordinators. Monitoring reports and data shall be kept in a secure folder on the server with limited access to the Compliance Coordinators. Any shared documents regarding monitoring of client files or any information or data containing confidential information will be limited to the Compliance Coordinators. Appropriate password protection and security measure implemented by the City of Springfield IS department will be followed.

## Technical Assistance & Training

One of the primary functions of the Compliance Coordinator(s) is to provide technical assistance to program staff in interpreting State Issuances, program reviews, findings, observations, and recommendations. This technical assistance will be provided in the form of contact and consultation on an as needed basis and through written "quality assurance notes" where warranted.

It will be the responsibility of the Compliance Coordinator(s) to ensure that trainings related to program and/or systems (i.e. State's database system) are made available to staff. The Coordinator(s) will work with State staff to ensure non-duplication of efforts.

## Errors and Deficiencies

When errors, deficiencies, and omissions are discovered, the Compliance Coordinator(s) will provide notice to the appropriate unit supervisor for corrective action. If a deficiency occurs repeatedly, subsequent report findings will be issued clarifying the procedures in question. When possible, the Compliance Coordinator should consult with the Board concerning legislation and federal or state regulations in order to prepare recommendations for corrective action. If fraud is found or suspected, the Compliance Coordinator will immediately notify the Director.

## Fraud and Program Abuse

Training will be conducted for all job center staff to acquaint them with the complaint/grievance process. All staff are encouraged to report any reported or questioned activity to the Compliance Coordinator(s) or as process dictates without fear of retaliation. When an allegation of fraud or program abuse is made, the Compliance Coordinator(s) will be notified and a preliminary investigation will be conducted immediately. The Compliance Coordinator(s) will report findings and recommendation in writing to the Executive Director of the Workforce Development Board who will decide whether the

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allegation will be reported to the Board. In the event, the fraud is committed on part of a subcontractor, no invoice will be paid during the investigation to the alleged offender. All correspondence concerning the investigation will be kept confidential and appropriately marked.

### **Change of Sub-State Monitoring Plan**

The Plan is subject to change based on changes in WIOA and issuances provided by the State.