

UPSTATE WORKFORCE BOARD MONITORING PROCEDURES

Compliance monitoring is a sequence of steps involving preparation and planning at the local level.

A. Access to Records and Documents

For the purpose of reviewing and evaluation provided under the Act, the Administrative Entity shall have access to and the right to copy any accounts, books, records, correspondence, or other documents pertinent to such programs that are in possession, custody, or control of the grantee.

B. Internal

1. At the beginning of each program year, monitoring schedules are developed and sent to the respective Grantees to be monitored. All Upstate Workforce Board members will be sent a copy of the monitoring schedule, encouraging them to accompany the monitor(s) on the visit. Two copies of the monitoring schedule will be forwarded to the SC Department of Employment and Workforce (SCDEW) and one copy to the Upstate Workforce Board Director.
2. At least one week prior to the scheduled on-site visit, the Grantee is contacted to arrange a time for the entrance conference and discuss planned visits to the entity's sub-recipients. Usually grantees will be notified of compliance monitoring visits, but the Upstate Workforce Board staff or its designated consultant, retains the right to make unscheduled on-site reviews when it is deemed in the best interest of the Upstate Workforce Board.
3. All Upstate Workforce Board grants will be monitored once during the grant period for programmatic compliance and once for financial compliance. Desktop monitoring, to include SCWOS data, will be ongoing throughout the year.
4. If the planned date for the on-site review is not convenient or conflicts with other activities of the entity or Upstate Workforce Board, either party may request to reschedule the on-site review. The visit will be rescheduled in accordance with both parties. The Upstate Workforce Board office must be contacted 48 hours prior to the visit for rescheduling requests unless there is an emergency.
5. Areas to be reviewed during on-site compliance monitoring visits include:
 - Performance and Compliance
 - Financial Procedures and Reporting
 - Equal Opportunity
 - Grievance Procedures
 - Competency Attainment
 - Workforce Innovation & Opportunity Act Eligibility Certification
 - Inventory (100%)

- Case Management Processes/Tools
- Spreadsheet associated with Local Instruction Letter 13-20 (Tracking Training Related Employment)
- Compliance with all OneStop processes
- Customer Interviews

C. Entrance Conference

The Upstate Workforce Board staff and/or its designated consultant will meet with the Grantee signatory or his/her designee and key program staff. The purpose, procedures, and anticipated length of the monitoring visit will be explained. The entrance conference will usually be conducted prior to reviewing the grantee's records when scheduling permits. A conference call, followed up with an email summary is acceptable.

D. On-Site Review

The Upstate Workforce Board staff or its designated consultant will review specific compliance areas using pertinent documents, records, staff, and customer interview(s) as appropriate. Upstate Workforce Board worksite and sub-tier agreements are included in the compliance review. The Grantee will arrange for the monitor(s) to meet with sub-tier vendor staff, worksite supervisors, and/or customer, as appropriate.

YOUTH:

A 50% review of participant files will be conducted for all first year youth Grantees (this may be done in separate visits). A 10% file review for youth Grantees over a year in existence should also be done at least once during the program year. Each Grantee will also be subject to a 10% Data Validation Review during the monitoring visit.

ADULT/DISLOCATED WORKER/TRADE:

A 5% file review for each Workforce Specialist will be conducted at each one stop site at least once during the program year. Each Talent Development Specialist will also be subject to a 10% Data Validation Review during the monitoring visit.

FINANCIAL:

Financial monitoring will occur during the same time frame as programmatic monitoring. At a minimum, the financial monitor will review one full month of expenditures for each Grantee (Adult/DW and Youth).

E. Exit Conference

1. At the conclusion of the on-site review, the monitor will meet with the Grantee signatory or his/her designee and key staff to review all findings. The Upstate Workforce Board Executive Director and/or the Associate Director will be present at the exit conference, when such scheduling is possible.

2. A preliminary report is issued during the exit conference. Discussion may occur regarding the basis or interpretation of the findings. The Grantee has ten (10) business days to reply to the monitor and include any supporting documentation.
3. Should all findings be addressed in the reply, an official letter will be issued stating that monitoring is complete. If findings are not cleared, an official report will be issued.

F. Official Report

1. An official report will be written and forwarded to the Grantee signatory within 20 business days following the exit conference. The report will include the time and scope of the review, identification of any deficiencies noted as a result of the monitoring, and recommendations for corrective action.
2. A letter from the Upstate Workforce Board Executive Director transmitting the report will:
 - a. request a response and corrective action plan within twenty (20) business days of the date of the transmittal letter if deficiencies are noted, or
 - b. advise the Grantee that no deficiencies were noted.
3. The Upstate Workforce Board Executive Director will review and discuss the monitoring report with the monitor prior to distribution. A copy of the monitoring report will be sent to the full Upstate Workforce Board, Youth Committee (if it is a youth Grantee), the Upstate Workforce Board Executive Director and the SCDEW staff person assigned to the Upstate area.

G. Grantee Response/Administrative Entity Disposition

1. The Grantee must respond to the monitoring report and any requests for corrective action within 20 business days from the date of the transmittal letter. The response will be reviewed with the Upstate Workforce Board Executive Director and monitor. A copy of the Grantee's response will be sent to the full Upstate Workforce Board, Youth Committee (if a youth Grantee) and Upstate Workforce Board Director.
2. The Upstate Workforce Board staff will review the response and notify the grantee of its decision within 10 business days of the date of the response.
 - If the response is satisfactory, the Grantee will be notified that no further action is required.
 - If the proposed corrective action is deemed unsatisfactory, the Grantee will be notified and asked to submit a revised corrective action plan within fifteen (15) business days of notification of decision.
 - The revised corrective action plan will be reviewed and the Grantee will be notified of a disposition within fifteen (15) business days of the date of the response.
 - Failure of the grantee to respond within the established time period will result in sanctions being imposed against the Grantee.



UPSTATE WORKFORCE BOARD EXECUTIVE COMMITTEE MEETING

January 7, 2015

12:00 p.m.

Upstate Workforce Board Conference Room

Present:

Mr. Curtis Anderson, Committee Chair

Ms. Ann Angermeier, Executive Director

Mr. Wade Ballard, Committee Member

Ms. Brent Bishop, Upstate Workforce Board

Mr. Craig Jacobs, Committee Member

Ms. Kara Tanenbaum, Upstate Workforce Board

Mr. David Wall, Committee Member

Ms. Dana Wood, Assistant Executive Director

Welcome and Opening of Meeting

The meeting was called to order at 12:12 p.m. by Mr. Curtis Anderson, Chair.

Year-to-Date Budget Review

Mr. Brent Bishop, Chief Financial Officer, Upstate Workforce Board, reviewed finances from July – November 2015.

- Office Budget reviewed and is tracking well on all accounts.
- Business Services is being contracted outside data system to Greenville as is going extremely well while saving money in duplicate staffing.
- Waiting on information as to how to proceed with Advertising/Promotion from state.
- Achieve – Billing will be received soon from USC Upstate as they are creating billing and financial forms for July through November 2015.
- Strategic planning is being modified for PY15 due to the layoff of two employees to which much of the tasks were assigned.

Obligate Recapture of Funds

- Ms. Ann Angermeier, Executive Director of Upstate Workforce Board, informed the committee that the three year strategic plan is being modified by staff to present to the committee at the next meeting. The changes are needed due to budget cuts and due to the layoff of two key personnel, Brenda Connelly and Shannon Wilkins. These two individuals had several of the tasks assigned to them. With WIOA implementation, it is impossible to focus on anything else this program year. Ms. Dana Wood will be going on leave in February for twelve weeks and that is going to seriously stall things in our office.
- Recaptured funds must be spent by June 30th we are spending those funds, but are setting aside the same amount in newer funds for the board to obligate later in case we have more budget cuts. Ms. Angermeier quickly briefed the board that the van was totaled when Mr. Dwayne Hatchett was driving it in Blacksburg. We will get a payout from this and will need to obligate those funds once received.

Policy Approval

- **Dress Code Policy:** reviewed with changes from the Executive Committee. Mr. Wade Ballard recommended that a cover sheet be attached to all policies. There should be a signature line on the sheet for staff to sign. The cover sheets should read that the policy is not a contract between the staff and the Workforce Board or Spartanburg County. The signed sheets should be kept on file with the policies. **The dress code policy was approved with no abstentions.**
- **Monitoring Policy**
- **Temporary Staff Time & Leave Policy:** It was decided to revisit this after the Spartanburg County handbook is issued.

Local Area Agreement Issues

Ms. Ann Angermeier, Executive Director of Upstate Workforce Board, reported the state had issued a document for the board chairs and fiscal agents to sign. Local area Workforce Directors and agency staff responded to the state concerning the document and did not receive an adequate response. It was recommended by Mary Ann Lawrence that we not sign the agreement because it would take local control away and give it to the state agency. Mr. Curtis Anderson has signed a letter requesting that SCDEW staff meet with all Board Chairs and Directors to go through the document since the boards are the decision makers. The fiscal agency staff should not be involved in the decision making.

Discussion on FIOA and Status

Ms. Dana Wood, Chief Operating Officer of Upstate Workforce Board, reported that a FOIA (Freedom of Information Act) was requested from Department of Labor after requesting a copy of the monitoring from DEW to DOL so we could make plans regarding the comprehensive one stop.

Adjournment

With no further business, the meeting was adjourned at 1:09 p.m.

Next Meeting Date: Tuesday, March 1, 2016

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Good afternoon, Board members:

At our Board meeting last Monday, 1/25/16, we did not have a quorum and therefore could not vote on several items. Attached and below please find these items that require your approval:

- Meeting Minutes 11.16.15
- Internal Policies
- ACHIEVE Grant Modification
- YouthStop Grant Modification

If you have any questions, please let me know.

This request is time-sensitive.

Meeting Minutes 11.16.15

Name _____
Approve _____ Disapprove _____ Abstain _____

Dress Code Policy

Name _____
Approve _____ Disapprove _____ Abstain _____

Monitoring Policy

APPROVED

Name _____
Approve _____ Disapprove _____ Abstain _____

ACHIEVE Grant Modification

Name _____
Approve _____ Disapprove _____ Abstain _____

YouthStop Grant Modification

Name _____
Approve _____ Disapprove _____ Abstain _____