

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 their visits. 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 to discuss planned visits to the entity's subrecipients. 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.
 - Local Board Monitoring Staff will be responsible for conducting the data validation quarterly reviews in October, January, April, and July on both active and exited records. Staff are responsible for validating the data for the previous quarter.
 - Staff will use the latest Participant Individual Report Layout (PIRL) document found at <https://www.dol.gov/agencies/eta/performance/reporting#current-reporting-reg> for definitions/instructions, program specific requirements and source documentation needed to perform data validation on each data element.
 - Staff will be expected to provide their data validation documentation, when requested, to the Office of Internal Audit, at least annually.

4. If the planned date for the on-site review is not convenient or conflicts with other activities of the entity or the 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 One Stop 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 customers, 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 5% 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 Talent Development Specialist will be conducted at each 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 twenty (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 monitoring staff transmitting the preliminary 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 final monitoring report will be sent to the full Upstate Workforce Board and the SCDEW staff person assigned to the Upstate area noting any items not cleared from the preliminary report.

G. Grantee Response/Administrative Entity Disposition

1. The Grantee must respond to the monitoring report and any requests for corrective action within twenty (20) business days from the date of the transmittal letter. The response will be reviewed with the Upstate Workforce Board monitoring staff.
2. The Upstate Workforce Board staff will review the response and notify the grantee of its decision within ten (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.

H. Follow-up

The Upstate Workforce Board staff will conduct a follow-up visit, whenever necessary, to review the actions taken to correct deficiencies within thirty (30) business days of the date of the final disposition. Advance notice may be given, or an unscheduled visit may be made to ascertain that corrective action has been taken. Additional follow-up visits may be scheduled on an as needed basis.

I. Technical Assistance

Technical assistance is provided upon written request from the Grantee during monitoring visits, or when the Upstate Workforce Board staff otherwise determine the need. A written report will be maintained in the Upstate Workforce Board office following the technical assistance visit. A copy of the Technical Assistance Request Form will be attached to each monitoring report when necessary.

THIS DOCUMENT IS NOT A CONTRACT, EXPRESSED OR IMPLIED, BETWEEN THE UPSTATE WORKFORCE BOARD OR SPARTANBURG COUNTY AND THE EMPLOYEE.