

# FLORIDA CROWN WORKFORCE BOARD, INC. POLICY

**POLICY TITLE: Monitoring Procedures**

**POLICY NUMBER: ADM-001-02**

**DATE EFFECTIVE: May 17, 2002**

**DATE REVISED: July 20, 2010**

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## **APPLICATION**

Florida Crown Workforce Board, Inc. (FCWB) Employees, Contractors and Service Providers.

## **PURPOSE**

To provide the One-Stop Service Provider of Region 07, which serves the counties of Columbia, Dixie, Gilchrist and Union, and the One-Stop Career Center partners, a copy of the implemented monitoring procedures.

## **POLICY:**

The FCWB will monitor on-site as often as circumstances warrant, but not less than once a month. Compliance documents may include the Contract, Proposal, Applicable Federal, & State Law, State & the FCWB policies and procedures and verification of fiscal integrity.

A minimum of twelve (12) Career Managers' files will be reviewed for program eligibility and accuracy on a monthly basis which will include WIA Adults, WIA Youth, and WIA Dislocated Worker, Welfare Transition, Wagner-Peyser, VETS and Navigator program files. All files for review must comply with the FCWB One-Stop Provider Customer File Organization Policy (OPS-004-02).

Barring any unforeseen circumstances, the FCWB will provide a minimum of ten (10) day written or e-mail notification of all monitoring visits. The One-Stop Career Center Program Managers will be kept apprised of the monitoring schedule.

Within five (5) days of the completion of the monitoring visit FCWB will provide a written monitoring report describing findings, required corrective actions, and contract performance. The Service Provider will respond in writing to 100% of monitoring/audit reports within ten (10) working days.

In addition to regular on-site monitoring reviews, FCWB may conduct follow-up reviews to verify implementation of corrective actions and corrective action plans as necessary. Technical assistance will be provided as requested and agreed upon by the FCWB Executive Director. At the completion of the technical assistance visit the FCWB will provide a written technical assistance report to the One-Stop Service Provider.

In the event an instance of possible fraud, abuse or mismanagement is uncovered during the monitoring visit; the Contract Specialist/Monitor will immediately report the incident to the FCWB Executive Director so that the appropriate corrective action can be taken. This may include, but will not be limited to, de-obligation of funds and cancellation or modification of a contract that is not in compliance with various federal and state regulations and/or the contract itself. Legal counsel may be sought during this process.

### **Monitoring of Closed Welfare Transition Files**

All Career Manager's Files that are eligible for closing, regardless of circumstances, will be reviewed by the Welfare Transition Program Manager (WTPM). This review shall include but not be limited to insuring that:

- All hard copy documentation is in correct file format;
- All documents are signed and dated by client and Career Manager, where applicable;
- Back-up documentation for expenditures has been verified;
- JPR and IRP screen information matches hard copy file documentation;
- Assessment (TABE) scores have been entered in electronic files.

The WTPM will complete review of files proposed for closure within five (5) working days after closure alert is received. After review by WTPM, all files will be forwarded to FCWB for final review and file closing. Files will be considered active until marked "CLOSED" by FCWB. Files requiring corrective action will be returned to WTPM for such correction.

- Job Participation Rate (JPR's) - WTPM will review ten (10) files from each Career Manager weekly to verify hard copy and electronic entries are equivalent and that all file activity has been entered, as applicable. WTPM will advise Operations Officer and Career Manager if corrective action is required. FCWB Contract Specialist/Monitor will review JPR entries on a monthly basis.
- Individual Responsibility Plan (IRP's) and IRP Updates – WTPM will review ten (10) files from each Career Manager weekly to verify

hard copy and electronic entries have been entered, as applicable. WTPM will advise Service Provider, Operations Officer and Career Manager if corrective action is required. FCWB Contract Specialist/Monitor will review IRP's and IRP Updates on a monthly basis.

### **Monitoring of Closed Workforce Investment Act Files**

All WIA files that are eligible for closing, regardless of circumstances, will be reviewed by the WIA Program Manager. This review shall include but not be limited to insuring that:

- All hard copy documentation is in correct file format;
- All documents are signed and dated by client and Career Specialist, where applicable;
- Back-up documentation for expenditures has been verified;
- Credential verification is in file.
- Assessment (TABE) scores, where applicable, have been entered in electronic files.

The WIA Program Manager will complete review of files proposed for closure within five (5) working days of nomination by WIA Youth/Adult/Dislocated Worker Career Managers. After review by WIA Program Manager the files are to be forwarded to the Project Leader (if applicable) for review. After review by the Project Leader (if applicable), all WIA files will be forwarded to FCWB Contract Specialist/Monitor for final review and closure authorization by FCWB staff. Files will be considered active until marked "CLOSED" by FCWB Contract Specialist/Monitor. Files requiring corrective action will be returned to WIA Program Manager for such correction.

### **Monitoring Review Sheets**

All Program Managers will review a minimum of ten percent (10%) of the files of each Career Manager weekly to verify that hard copy Monitoring Review Sheets are in each file completed by the Career Specialist. Service Provider's Quality Assurance, if applicable, may also complete Monitoring Review Sheets and will advise Program Manager, Service Provider and Operations Officer if a Career Specialist has not done so. FCWB Contract Specialist/Monitor will review Monitoring Review Sheets completed by the Career Specialists on a monthly basis.

### **Monitoring of Programmatic Activities**

Monitoring of Programmatic Activities, as a minimum, will include the following:

- Comparison of the customer file count to the official state information system and the monthly report.
- Documentation and review of appropriate eligibility criteria.
- Verification of the accuracy and the completeness of the individual assessment documentation.
- Verification of descriptive and timely case management/counseling notes.
- Verification that the MIS/OSST/OSMIS or other information system instruction procedures are being followed and that data is being entered into the system timely and accurately that documents all services and training activities provided to each customer.
- Verification that all FCWB, Federal and State of Florida procedures and policies are followed.
- Adherence to the contract '*Statement of Work*' and the '*Terms of the Contract and Performance and Standards.*'
- Review all forms and documents supporting payments, including customer actions, supportive service payments, tuition, books, supplies and OJTs for accuracy.
- Verification that work sites comply with Fair Labor Standards and Child Labor Laws outlined in the regulations for age appropriate youth.
- Review pay records and attendance records and reports to insure controls are established preventing unauthorized payments.
- Contract performance.
- Verification of the Customer Satisfaction Survey Forms.
- Review and validate weekly Consolidated Customer Expense Log Summary.
- Adjudicates and reconciles any questioned costs with Service Provider.
- Verification of ADA compliance.
- Monitoring of grants.

### **Monitoring Schedule**

The following monitoring schedule will be followed to ensure that an orderly and complete review of the Service Provider activities and performance is accomplished in a timely manner. More frequent monitoring may need to be done on a case-by-case basis.

- **Weekly**  
Career Center  
Case File Reviews  
Corrective Action Reports as necessary

- **Monthly**  
Fiscal Monitoring  
Purchase Orders and Invoices  
Contract/Performance Reviews
  
- **Quarterly**  
Fiscal Monitoring  
Board Meetings
  
- **Annually**  
Board Composition  
Bylaws  
Fiscal Monitoring  
EEO/ADA/Discrimination/Affirmative Action, etc.  
Program Year Wrap-up  
Review FCWB Plans and Policies  
Inventory
  
- **Ad Hoc**  
Committee Meetings

### **Monitoring Tools**

Monitoring tools have been developed and adapted from the United States Department of Labor Monitoring TAG and other monitoring sources. As with any active monitoring activity, the procedures and tools will be updated and revised to meet current federal, state or local requirements on an as needed basis. Copies of the monitoring tools are being provided to the service provider as created or revised. AWI monitoring tools for customer eligibility, policies and procedures are currently being used at the One-Stop Service Provider.

### **WIA/WTP Intake and Eligibility**

A majority of WIA and WTP disallowed costs are a direct result of enrolled participants who have not met the eligibility requirements; therefore, this category must be reviewed often.

### **Service Provider Compliance**

FCWB verifies that the service provider is in compliance with the terms of grants, contracts or other agreements.

The service provider (Contractor) will provide supporting documentation to support all amounts on the monthly invoices submitted. When the invoices are received, reconciliation will be performed between all amounts on each invoice and the supporting documentation.

### **Procurement**

Items/services that exceed \$25,000 in estimated costs will be reviewed to verify that the FCWB Competition/Solicitation process was strictly followed. A procurement-monitoring tool is developed, which verifies the RFP process, the rating, committee & board review and approval. (Abstentions if a conflict).

### **Contract Provisions, Certifications and Assurances**

All contracts will be reviewed prior to execution to identify whether the entity is a vendor or subrecipient. The Federally Required Contract Provisions, Certifications and Assurances Core Checklist will be utilized.

### **Federal Awards**

FCWB will verify the following:

- That each subrecipient has been informed of Federal awards by CFDA title and number, award name and number, award year, if the award is R&D, and name of Federal agency.
- That subrecipients have been advised of requirements imposed on them by Federal laws, regulations, and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by the pass-through entity.
- That Federal awards are used by subrecipients for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.
- That subrecipients expending \$500,000 or more in Federal awards during the subrecipient's fiscal year have met the audit requirements applicable.
- That a management decision on audit findings is issued within six months after receipt of the subrecipient's audit report and ensure that the subrecipient takes appropriate and timely corrective action.
- Whether subrecipient audits necessitate adjustment on the pass-through entity's own records.
- That each subrecipient permits the pass-through entity and auditors to have access to the records and financial statements as necessary for the pass-through entity to ensure compliance with applicable audit requirements.

## **Financial Monitoring**

### **FCWB will verify the following:**

- That the Cost Allocation Plan is consistently and properly followed and documented after appropriate approval.
- That the allocation of costs is in accordance with the Cost Allocation Plan and auditable.
- That each subrecipient is required to pass through records and financial statements to the administrative entity, auditors, and State/Federal inspectors.

## **Monitoring of EEO**

EEO activities will be monitored annually by the EEO Officer.

## **OSST and OSMIS Information Systems**

OSST, OSMIS and any other information system will be continuously monitored to verify that the required data is entered into the system in a timely and accurate manner.

## **ACTION**

All FCWB employees, contractors and service providers will adhere to this policy.

Approved: *John Chastain*

John Chastain, Executive Director