

Ten Steps to Developing an Effective State Monitoring System



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ABOUT THIS GUIDE

This Guide was written by staff members of Social Policy Research Associates (SPR) on behalf of the U.S. Department of Labor, Employment and Training Administration, under the Office of Regional

Management technical assistance project (DOLU101A21499, BPA# DOLU121A21899). As part of this project, the Employment and Training Administration contracted with Social Policy Research Associates (SPR) and Giuffrida Associates (GA) to deliver technical assistance and training services using Program Year 2011 Regional TAT funds under the direction of the six Regional Offices. Three Regional Offices—Boston, Philadelphia, and San Francisco—approached SPR about developing a guide that addressed key elements of effective program monitoring and that highlighted states with effective oversight and monitoring practices.

To identify states with effective program monitoring practices, SPR conducted informal discussions with Federal Project Officers across all six ETA Regional Offices and state staff members in 15 states from February to April 2013. The purpose of the calls was to gather a better understanding about how these respective states oversee and monitor WIA program elements, what policies and procedures they have in place, and how they communicate findings from monitoring activities to local subrecipients. The calls also gathered information about how states use their oversight and monitoring practices to identify innovative strategies for serving customers and identify technical assistance and training needs among local areas and service providers. This guide identifies the key elements of effective state monitoring systems.

The opinions expressed herein are those of the authors (SPR) and not necessarily those of the Employment and Training Administration (ETA).

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TABLE OF CONTENTS

INTRODUCTION: A ROADMAP TO SUCCESS	6
STEP ONE: UNDERSTAND THE VARIOUS GOALS OF OVERSIGHT AND MONITORING	8
Federal Laws and Regulations.....	8
Four Primary Reasons for Conducting Monitoring	8
Key Questions: Understanding the Importance of Monitoring.....	9
STEP TWO: DEVELOP AN INTEGRATED FRAMEWORK FOR THE STATE MONITORING SYSTEM	10
Required Elements of a State Monitoring System	10
Develop State Monitoring Policies and Procedures.....	11
Key Questions: Develop an Integrated Framework for the State Monitoring System.....	13
STEP THREE: DEVELOP, CUSTOMIZE, AND UPDATE STATE MONITORING TOOLS	16
Common Monitoring Tools	16
Key Elements of Effective Monitoring Tools	17
Using Open-ended Questions in Your Monitoring Tools	18
Key Questions: State Monitoring Tools.....	20
STEP FOUR: BUILD STAFF CAPACITY	24
Required Skills and Abilities of Monitoring Staff.....	24
Approaches for Building the Capacity of State and Local Monitors.....	25
Develop State Oversight and Monitoring Points of Contact	26
Key Questions: Build Staff Capacity	27
STEP FIVE: Developing a Risk Assessment Tool	30
Using Risk Assessment Tools.....	32
The ETA Regional Offices’ Approach to Risk Assessment	32
Key Questions: Risk Assessment	35
STEP SIX: Using Desk Reviews to Prepare for Onsite Monitoring Visits	38
Using Desk Reviews for Frequent Program Monitoring.....	39
Key Questions:	41
STEP SEVEN: PREPARE FOR & CONDUCT ONSITE MONITORING REVIEWS	44
Preparing for the Onsite Monitoring Visit.....	44
The Components and Tools of an Onsite Monitoring Visit	46
Reviewing Key Program Elements.....	47

Reviewing Participant Case Files	50
Key Questions: Onsite Monitoring Review	51
STEP EIGHT: COMMUNICATE MONITORING RESULTS.....	54
Methods of Communicating Monitoring Results	54
The Crucial Difference between Findings and Observations	55
Using the Four Cs	55
Formatting Your Written Monitoring Reports	55
Key Questions: Communicating Results.....	57
STEP NINE: MANAGE CORRECTIVE ACTION	60
Recommended Elements for Corrective Action Plans	60
Managing Corrective Action.....	61
Key Questions: Corrective Action.....	62
STEP TEN: IDENTIFY AND ADDRESS TECHNICAL ASSISTANCE NEEDS AND SHARE PROMISING PRACTICES	64
Providing Technical Assistance	64
Incorporating Technical Assistance into a Continuous Improvement Cycle	65
Sharing and Disseminating Promising Practices	65
Key Questions: Technical Assistance and Promising Practices	67
APPENDICES.....	69
APPENDIX A: Key WIA Statutory References Pertaining to Oversight and Monitoring.....	70
APPENDIX B: Key WIA Regulatory References Pertaining to Oversight and Monitoring.....	76
APPENDIX C: Readiness Assessment Tool for Effective Program Monitoring	83
APPENDIX D: Customer Interview Guide	91
APPENDIX E: Resource Room Customer Interview Guide	94
APPENDIX F: Resource Room Observation Guide	97
APPENDIX G: Case Management Session Observation Guide	101
APPENDIX H: Corrective Action Planning Tool.....	104
APPENDIX I: Selected Technical Assistance Resources on Case Management.....	108
APPENDIX J: Selected Technical Assistance Resources on State Monitoring Tools.....	109

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INTRODUCTION:

A ROADMAP TO SUCCESS

The Workforce Investment Act of 1998 established a public workforce system in which states and local workforce investment areas administer a variety of federal employment and training programs through the American Job Center (AJC) system. Oversight and monitoring of the Act's requirements and the system's operations by the DOL, state agencies, and local administrative entities is enumerated in the statute and its corresponding regulations. Typically, state workforce agencies establish special units or offices whose primary responsibility it is to oversee and monitor administrative, fiscal, and program operations to ensure that they are being operated in a manner consistent with federal statutes, regulations, and state workforce plans. ETA also envisioned that states would assure compliance with program requirements outlined in the Act and that states and local sub-recipients would also maintain high-levels of service quality and an effective use of federal funds.

The public workforce system is intended to function as a partnership between federal, state, and local levels, and this partnership is manifested through the monitoring system described in the Act. In this partnership, every level has a specific function and role in ensuring that the federal funds are used appropriately, effectively, and for their intended purpose. Basically, DOL provides guidance about the public workforce system to states, oversees state workforce agencies' operations, and provides technical assistance and training to state staff to help achieve quality program design and service delivery. The states, in turn, develop policy guidance for their sub-recipients, oversee sub-recipients' operations and service delivery, and provide technical assistance to local program staff. Local sub-recipients provide guidance to AJC operators and service providers, oversee local program operations, and address concerns of their service providers. Your monitoring system should be used to identify promising practices and areas for improvement. Effective oversight and monitoring strategies are meant to drive the continuous improvement process through assessment, analysis, corrective action, technical assistance, and peer sharing of promising practices. If you are among the staff members at your state office responsible for WIA monitoring, you play a key role in determining how, and toward what ends, the monitoring system functions in your state and you are, therefore, the linchpin of the partnership's effective functioning.

There has been a tendency for state-level monitoring to focus on fiscal and administrative compliance elements. While compliance with fiscal and administrative guidelines is important, it is only part of what is necessary to operate programs effectively. Monitoring should also further the ultimate goal of providing high-quality employment and training services to jobseekers and ensuring that the public workforce system can supply a skilled labor force for businesses. To this end, monitoring is also about continuously improving upon the way the system designs program elements and serves customers.

This guide was created as a tool to help you understand the importance of incorporating program elements related to quality service design and delivery into your oversight and monitoring strategies and to understand the key steps of building an effective monitoring system. Because state monitoring systems vary considerably in terms of the elements currently in place, this guide cannot assume that any particular element or feature exists in your state. It must therefore describe the "ideal system" and explain how all of its elements may be constructed from the ground up. For this reason, it is up to you to decide how the information, recommendations, and examples of innovative practices contained in this guide apply to the unique situation in your state and how they can be used to improve and polish your existing monitoring system.

STEP ONE

UNDERSTAND THE
VARIOUS GOALS OF
OVERSIGHT AND
MONITORING

STEP ONE:

UNDERSTAND THE VARIOUS GOALS OF OVERSIGHT AND MONITORING

The main reason it is imperative for states and sub-recipients to oversee and monitor American Job Centers (AJC) and workforce programs operated through the centers is that it is required under the Workforce Investment Act of 1998 (WIA) and its regulations. Beyond the requirements in the Act and regulations, which are enumerated in Appendices A and B, it is the fiduciary responsibility of each state, as a recipient of federal tax dollars, to ensure that the funds expended for workforce programs and services are meeting Congress' intended purpose. Also, oversight and monitoring activities provide a valuable opportunity for federal, state, and local organizations to identify innovative strategies and technical assistance and training needs. The information gathered by your state monitors can be used to improve operations and service delivery, which will translate into improved employment opportunities for American workers and improved productivity for American businesses. In sum, it just makes sense to know how things are working at a state and local level and to have information that can be used to make Informed Decisions.

Federal Laws and Regulations

A state monitoring system cannot be developed without a thorough understanding of the requirements contained in the Act and regulations. So, it is vitally important that your state monitoring staff have familiarity with the Act and regulations, Training and Employment Guidance Letters (TEGLs), and applicable OMB circulars.

Under WIA sections 111 and 117, state and local boards are required to monitor and evaluate the effectiveness of WIA programs and to seek opportunities for continuously improving the statewide workforce development system. Laws and regulations governing workforce programs do not, however, reside solely at the federal level. WIA allows for a tremendous amount of state and local flexibility, so you should also work to identify state laws, regulations, and policies and procedures governing state workforce programs. This will allow your state monitors to identify program design and service delivery functions that are working well and ones that are not working well in meeting the vision of the public workforce system established by the governor and state board. Appendices A and B contain the statutory and regulatory citations that apply to oversight and monitoring.

Four Primary Reasons for Conducting Monitoring

There are four primary reasons for developing a state monitoring system:

- **Compliance:** The most common reason to conduct oversight and monitoring of sub-recipients is to ensure that funds spent on program activities are allowable and that the services provided by states and local sub-recipients comply with federal, state, and local requirements.
- **Management:** Management monitoring represents a more in-depth examination of program activities. It is intended to assure that the delivery of employment and training services is working well and meeting the needs of different groups of customers. Managerial monitoring is based on certain assumptions about what constitutes "good" or quality program design and delivery. States then use established criteria to see if local sub-recipients have those attributes present in their programs. An example of managerial monitoring is assessing whether a jobseeker's skills and abilities were assessed and whether assessment information was used to help the customer make informed employment and training decisions.

- **Evaluation:** Some states use monitoring activities, like desk reviews and onsite monitoring visits, to gather information that can be used to evaluate the effectiveness of a sub-recipient's programs or services. Evaluation begins with a comparison of planned results versus actual results and proceeds to an analysis of the reasons for such results and the impacts those results will have over a period of time. Using monitoring activities to evaluate the effectiveness of programs requires a more rigorous and systematic process that uses both qualitative and quantitative information to analyze the program. The Act and regulations encourage states to evaluate their public workforce systems.
- **Performance:** Many states use monitoring activities to look at sub-recipients' and local service providers' performance on a series of programmatic and fiscal measures to see whether minimum levels of performance are being met. Most states base performance on the WIA Common Measures, outlined in TEGL 7-99, but some states also have other measures they use to assess sub-recipients.

In summary, to implement an effective monitoring and continuous improvement process, your state agency must shift to a culture that promotes its role as the grant recipient and, therefore, the primary agency responsible for compliance and effective programs. Even while you assume this responsibility, it is important to foster a relationship of trust and open dialogue with your sub-recipients. In doing this, sub-recipients will be encouraged to reach out to you for assistance and to express their technical assistance and training needs, which will help to improve the quality of programs and ultimately the fiscal and program performance of these programs.

Oversight and monitoring epitomizes the partnership between federal, state, and local partners. DOL provides guidance to the national public workforce system, oversees state workforce agencies, and delivers technical assistance and training to state staff. The state in turn provides policy guidance to local areas, oversees local operations, and delivers technical assistance to local sub-recipients. Local sub-recipients take it a step further by providing guidance to their staff and service providers, overseeing what their staff are doing, and providing technical assistance as needed.

Key Questions: Understanding the Importance of Monitoring

- Does the state's system for monitoring incorporate a continuous improvement cycle where innovative strategies and technical assistance and training needs are identified and resolved?
- Does the state have a plan or set of policies and procedures governing how it will conduct oversight and monitoring of federal programs?
- Does the state clearly communicate the importance of oversight and monitoring to state agency staff and local sub-recipient staff?
- Does the state conduct monitoring on an ongoing basis?
- Is the state equally emphasizing program quality (e.g., service design and delivery) along with fiscal and administrative compliance?
- Has the state identified key statutory, regulatory, and policy elements at the state level that require oversight and monitoring?

STEP TWO:

DEVELOP AN INTEGRATED FRAMEWORK FOR THE STATE MONITORING SYSTEM

Your state monitoring framework should outline the policies, procedures, approaches, and activities you will undertake to ensure compliance with the Act and WIA regulations and how you will staff these activities. In order for your oversight and monitoring system to be effective in helping to improve your program operations and services, the activities your state monitoring staff undertake need to occur frequently so you can remain connected to local sub-recipients' operations and activities. As one ETA representative stated, "monitoring is not an event, it is an approach and a way of doing business and should be incorporated into every facet of program design and service delivery." If monitoring is treated as part of a continuous improvement cycle, it becomes less of an isolated "I got you" activity. Rather, it becomes part of people's daily work activities and drives state and local staff members to identify what is working well and what is not so as to ensure positive outcomes for customers and the system and to ensure a return on the federal investment.

Required Elements of a State Monitoring System

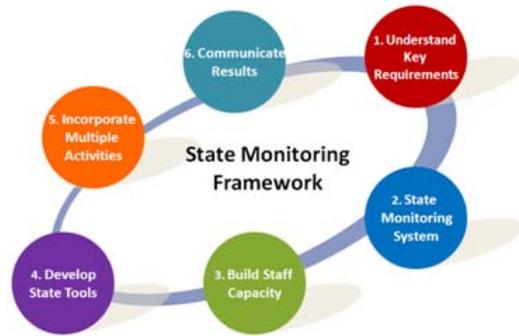
Your governor must be able to demonstrate, through a state plan or policy, that the state monitoring system meets the requirements outlined in 20 CFR § 667.410. Even if you are a state that is a single local workforce investment area, you are still required to oversee and monitor your state operations, local AJCs, and service providers and ensure that your state is meeting the objectives of the public workforce investment system outlined in the WIA statute and regulations. At a minimum, state monitoring systems must:

- provide for an annual onsite-monitoring review of local areas' compliance with DOL uniform administrative requirements at Section 184(a)(4);
- ensure that established policies to achieve program quality and outcomes meet the objectives of the Act and WIA regulations, including services provided through AJCs, eligible providers of training, and eligible providers of youth programs;
- enable your state to determine if sub-recipients and contractors have demonstrated substantial compliance with WIA requirements;
- enable your state to determine whether a local plan will be disapproved for failure to make acceptable progress in addressing deficiencies;
- enable your state to ensure compliance with nondiscrimination and equal opportunity requirements of WIA section 188 and 29 CFR Part 37;
- enable your state to require local sub-recipients take prompt corrective action if any substantial violation of standards occurs; and
- allow your state agency to impose sanctions if corrective action is not taken.

Appendix C contains a self-assessment readiness tool that you can use to determine where you are in the process of designing an effective program monitoring strategy. This tool can be adapted and tailored to meet your needs.



EFFECTIVE PROGRAM MONITORING
Readiness Assessment Tool



The *Effective Program Monitoring Readiness Assessment Tool* was developed to assist state staff in forming and implementing their oversight and monitoring strategies at the state and local levels. This tool will help staff assess their state’s oversight and monitoring strategies by looking at progress, priorities, gaps, and next steps. The tool is divided into the six key elements of developing an effective oversight and monitoring framework that will inform the state’s monitoring system. These elements are: (1) Understand Key Requirements, (2) Develop an Integrated Framework for State Monitoring System; (3) Build Staff Capacity, (3) Develop Customized State Monitoring Tools, (4) Incorporate Different Types of Monitoring Activities and (5) Communicate Results.

Using This Tool

The assessment tool is organized under the six key elements and includes corresponding indicators that are components of each element. Working in a team, examine the indicators to determine your state’s progress on each key element. A four-point scale representing the phases of ongoing development will help you determine where your state is on achieving each key element. For each indicator, identify the place on the scale that best reflects your current effort and circle the number.

The four-point scale to assess progress is based on the following definitions:

1. **Initiation Phase:** The team has discussed this indicator but has not started planning.
2. **Planning Phase:** The team is engaged in a planning process to agree upon the steps necessary to move forward.
3. **Implementation Phase:** The team has completed planning and is in the process of implementing strategies.
4. **Enhance Phase:** Strategies have been fully implemented. Your state monitoring staff is managing for enhancement of this indicator.

The priority for action on any indicator can be ranked as high, medium, or low by circling A, B, or C (respectively) in the far right column.

Social Policy Research Associates
Effective Program Monitoring Readiness Assessment Tool

Page 1 of 4
May 2013

Develop State Monitoring Policies and Procedures

Each recipient and sub-recipient of WIA Title I-B funds is responsible for conducting regular oversight and monitoring of its WIA activities to ensure that proper measures are in place to safeguard the use of those funds, including the activities of sub-recipients and contracted service providers. Most state agencies include some general language about how they will oversee and monitor federally-funded programs in their Wagner-Peyser and WIA State Plan or Unified Plan. While information in your state plan is useful for communicating to ETA how you will oversee and monitor sub-recipients, we recommend that each state develop policies and procedures advising local sub-recipients and service providers how the state will monitor them. Clearly identifying and describing the methods, procedures, and activities you will use to monitor your sub-recipients and your expectations for their monitoring practices helps to create an effective monitoring system that meets the goals and requirements outlined in 20 CFR § 667.410 above.

When developing your monitoring policies and procedures, ensure that they are easily understood, easily implemented, and clearly identify the intent of the monitoring process. Monitoring activities should be seen as an integral part of your state’s continuous improvement efforts. It is recommended that state agencies be as specific as possible in developing their policies and procedures so that it is clear how sub-recipients and their service providers will be monitored, when they will be monitored, and by whom. In addition, it is also important for state agencies to require local sub-recipients to incorporate similar procedures into their local program administration. At a minimum, the policies and procedures governing your state monitoring system should address the following questions:

- What programs and components of the public workforce system will be monitored (i.e., which federal programs or grants and what fiscal and program components will be reviewed)?
- What types of monitoring activities will be undertaken (e.g., risk assessments, desk reviews, data analysis, report and data element validation, onsite monitoring visits)?
- What will be the frequency of these monitoring activities (i.e., which activities will occur monthly, quarterly, yearly)?
- What unit(s) or division(s) within the state agency will be responsible for ensuring that the monitoring activities occur?
- How will the state use the information gathered (i.e., identify technical assistance and training needs, identify promising practices)?
- When and how will the state communicate findings to local sub-recipients?
- What follow-up will the state require of local sub-recipients (i.e., corrective action plan process)?

Sub-recipients should follow the state’s lead, but they can also develop their own policies and procedures, as long as they keep in mind that they are responsible to ensure that proper systems are in place, are being followed, and meet the requirements of the law. Monitoring practices need to be designed to reinforce ETA principles, determine if program outcomes are being achieved, and ensure that a high level of integrity is maintained.

The establishment of a separate monitoring unit gives staff time and the opportunity to focus on the requirements in the law and regulations and helps them do a comprehensive review. As a member of a monitoring staff, you should be reviewing case notes for documentation and evidence of services that the notes say were provided. You should also explore files to determine what happened if the notes don’t tell the story of what was provided and why. You should be able to identify weaknesses and areas of non-compliance, and, based on those, develop a technical assistance plan. However, you will also need to work closely with the fiscal and program units in your state to ensure coordination, and that information going out to the locals is consistent. Fiscal and program staff need to communicate effectively with the state monitoring staff to ensure that all members of the monitoring team are clear on state policies and procedures communicated to sub-recipients and service providers.

Working closely with your state’s program, fiscal and MIS staff is an important piece of building an effective monitoring system.

Key Questions: Develop an Integrated Framework for the State Monitoring System

- Which units within the state agency will be involved in shaping the state’s monitoring approach (e.g., program, fiscal, data analysis/MIS)? Are the state’s monitoring activities well coordinated with the activities of other state staff who do not have direct responsibility for monitoring?
- Does the state have policies and procedures governing its monitoring system?
- Does the state have a process for assessing program quality as well as fiscal and administrative compliance?
- How does the state stay abreast of local program and AJC operations?
- What information does the state require sub-recipients to submit monthly, quarterly, and annually in order to oversee and monitor sub-recipient programs?
- How will the state communicate findings from monitoring activities (i.e., desk reviews and onsite monitoring visits)?
- Who will review and have final authority for communicating monitoring results?

STEP THREE

DEVELOP,
CUSTOMIZE AND
UPDATE STATE
MONITORING
TOOLS

STEP THREE: DEVELOP, CUSTOMIZE, AND UPDATE STATE MONITORING TOOLS

The tools your state uses to carry out the monitoring functions are very important because they determine both the nature and scope of what you monitor as well as how the monitoring will take place. A number of states use ETA's Core Monitoring Guide, its supplemental guides or checklists to monitor sub-recipients and sub-contractors. While these tools are valuable resources, their focus is limited to the elements most critically in need of review by states. To increase the scope and thoroughness of your monitoring, we recommend you develop customized monitoring instruments that incorporate key program design and service delivery elements of the WIA adult, dislocated worker, and youth programs into your review guides.

Common Monitoring Tools

The most common tools used by state monitors are monitoring guides and checklists. Each type of tool serves a different purpose. The checklists are usually made up of items referring to general elements (fiscal, administrative, and/or program-related) for which you make a quick yes or no determination of whether specific compliance components are in place and normally contain general elements (fiscal, administrative and/or program), whereas monitoring guides contain detailed questions to elicit a responses from sub-recipients and service providers.

Monitoring Guides

Guides contain detailed questions that state monitors use to determine whether fiscal and program elements are in place and to assess the quality of those elements in terms of their ability to meet the employment and training needs of customers. The most common monitoring guides are desk review guides and onsite monitoring guides. Desk review guides are used by state monitors to analyze information submitted by sub-recipients. These guides usually identify what pieces of information you should collect prior to the onsite-monitoring visit and what information can be analyzed at your desk. Onsite monitoring review guides are used by state monitors during onsite visits to gather information about fiscal and program components. Some states organize their monitoring guides by program area (i.e., youth, adult, dislocated worker, etc.). These guides usually contain open-ended questions that allow you to ask questions of local staff administering and operating the programs.

It is important for your monitoring guides to contain qualitative program elements with descriptions of each of the program elements that should be present. In-depth discussion guides help you to identify areas that are working well (promising practices) versus areas that are not and may require technical assistance and training. It is helpful for monitoring guides to contain statutory and regulatory references and direct monitors on what fiscal and program elements should be reviewed. It is also valuable to incorporate questions that are designed to get at quality elements of service design and delivery, including questions for partner program staff and even customers of the AJCs.

"It is important for state monitors to "peel back the onion" to see how programs are operating and whether services are well-coordinated across partners."

ETA FPO

Checklists

A checklist is a type of informational job aid used to help state monitors assess whether certain pieces of information or program components are in place. Checklists help to ensure consistency and completeness in carrying out the monitoring task. While checklists help you to identify whether program elements or services are in place, they do not by themselves allow a determination of whether the program elements are having the intended impact. For example, you could use a checklist to show that Individual Employment Plans (IEPs) are being developed by case managers, but you would need a more in-depth discussion with local case managers to assess if IEPs are used to help customers make informed decisions about their employment and training options. This is why we recommend you use monitoring checklists in conjunction with monitoring guides that have specific open-ended questions about how services are designed. This allows you to ascertain whether local sub-recipients are operating their programs in a way that complies with the intent of the public workforce system outlined in the WIA. A number of states also use checklists to verify whether current members of local boards and youth councils meet the WIA statutory and regulatory requirements. Depending on the answer to items on the checklists, you may decide to use your monitoring guide to dig deeper into specific components during their onsite monitoring visit.

Key Elements of Effective Monitoring Tools

As already stated, WIA allows for a substantial amount of flexibility in how states operate their programs. Because of the flexibility in the statute, your state public workforce investment system may vary slightly or substantially from the direction of another state. For example, some states operate as single local workforce investment areas, while others have multiple local workforce investment areas they must administer and oversee. In some instances, your state workforce investment board may place emphasis on regional economic development initiatives and addressing employers' needs by supporting customized and on-the-job training programs. In other instances, a state's board may be focused primarily on skills gap training and the individual needs of jobseekers. This results in two distinct ways of assessing the success of the public workforce investment system across states. For this reason, we recommend your monitoring tools be customized and updated on a regular basis to reflect the goals and initiatives in your state. We also recommend that you incorporate open-ended questions that can be used to conduct interviews with respondents across multiple layers of the organization and service delivery system (i.e., administrative entities, AJC operators, line staff, AJC partners) to assess program compliance and quality.

In summary, four practices ensure that your monitoring tools remain optimal:

(1) Customize your monitoring tools

It is important to customize monitoring tools to incorporate references to state laws, regulations, and policies. You should look for opportunities to include references to state policies and procedures as well as ways to incorporate service delivery and design elements into your monitoring tools. In some instances, your state board may have set out a strategic vision for the public workforce system and your monitoring tools should include questions that reflect the state's workforce priorities. The ability to use customized monitoring tools allows you to establish clear and consistent criteria to monitor local program operations and programs.

(2) Update your monitoring tools to reflect changing circumstances

In addition to customizing your monitoring tools to reflect the unique nature of state policies and procedures, it is also important for you to continually modify and update your monitoring tools. We recommend that monitoring tools be reviewed annually so as to incorporate key findings and concerns from the current year's monitoring activities and to incorporate new federal and state policies and priorities. This process of

reviewing and modifying monitoring tools allows you to use information gathered from sub-recipient monitoring activities to influence the design and focus of future monitoring cycles.

(3) Use open-ended questions

In order to understand how customers are served by local program providers, it is important for you to include open-ended questions into your monitoring tools that managers and line staff can respond to during onsite monitoring visits. We also recommend that the same series of open-ended questions be asked across multiple respondent groups (i.e., local board members, administrative entity, AJC operator, line staff) to ascertain whether all levels of the service delivery continuum understand key policies and procedures and are implementing those policies and procedures consistently. The “Asking Open-Ended Questions” section below provides additional guidance on how to incorporate open-ended questions into your state monitoring tools.

(4) Incorporate opportunities to speak with customers and observe activities

Finding opportunities to elicit customer feedback and observe service delivery activities during your onsite monitoring visit is another key feature of successful monitoring approaches. Talking with customers about their experiences allows you to learn whether the services being offered through the AJCs meet the intent of the law and your state’s vision. It allows you to identify if customers are moving along the various tiers of service and receiving referrals to partner-funded programs as outlined in your state’s workforce plan. If time is limited and you cannot conduct customer interviews, you may be able to spend some time observing customers in the resource room or observe a case manager/customer appointment. Appendices D through G provide examples of interview protocols that can be used to observe activities and conduct interviews with participants.

Using Open-ended Questions in Your Monitoring Tools

ETA recommends that you use oversight and monitoring to obtain a deeper understanding and appreciation for what your local sub-recipients are doing to serve customers. One of the goals of monitoring is to identify opportunities for continuous improvement of the workforce system. Using open-ended questions to discover the root causes of strengths can help reveal promising practices and innovations, as well as identify the underlying challenges and barriers to success.

When you use open-ended questions to identify the strengths, assets, and capabilities of your local sub-recipients, those strengths can help frame the conversation and monitoring experience from one of “I gotcha” to one that can create new possibilities for systemic improvement, change, and positive action. In addition, positively-framed open-ended questions can help reveal opportunities for using peer-to-peer mentoring. For example, an effective enrollment strategy developed by one sub-recipient might be adapted by another that is experiencing difficulty identifying motivated job seekers.

Begin by inviting a person/ focus group to share a positive aspect of their work. For example, you could ask management staff to describe an aspect of their local area that is particularly successful/effective or to describe something of which they are particularly proud. The conversation might reveal an effective new partnership, a successful new workshop format, or a new way of sharing information between line-staff.

Once interviewees have had an opportunity to describe something that is working well, you can use that information to frame follow-up questions that help reveal the root cause(s) of that success (i.e., explore reasons why that approach might work so well) as well as a way to uncover barriers (i.e., are barriers in place that keep that approach from being expanded into other areas?). Knowledge about the underlying causes of successes and challenges can be used to make changes that lead to greater success and effectiveness.

Positively-framed questions can also be used to address compliance or performance issues that came up in the last review, but by setting a positive tone and communicating a genuine desire to listen and understand, it is more likely that root causes, both positive and negative, will be revealed and shared. Fear is replaced by trust, which is an important element of effective program monitoring.

Questions for Administrative Entity Staff:

- Describe an aspect of your local area that is particularly successful/effective.
- Describe something that has happened since our last review for which you are particularly proud.

Questions for Local Board Members:

- What value does your local board bring to your community?



Appreciative Inquiry (AI)

According to evaluators, Appreciative Inquiry (AI) is a useful method for monitoring because it elevates the meaning or value of what you are investigating. “To appreciate means to value – to understand those things of value or worth valuing. To inquire means to study, to ask questions, to search. AI is, therefore, a collaborative search to identify and understand the organization’s strengths, its potentials, the greatest opportunities, and people’s hopes for the future.”

As a method of organizational change, AI differs from traditional problem-solving approaches. The basic assumption of problem-solving is that people and organizations are fundamentally “broken” and need to be fixed. In contrast, the underlying assumption of AI is that people and organizations are highly generative. They are always growing, evolving, and moving toward the future. AI focuses the whole organization on identifying its “positive core” – its greatest assets, capacities, capabilities, resources, and strengths – to create new possibilities for change, action, and innovation. Check out the AI website provided for additional resources that can be incorporated into your state’s monitoring strategy.

Adapted from
<http://appreciativeinquiry.case.edu>.

- Describe something that has happened because of the board, maybe a partnership/ collaboration that has been created or an action that has been taken, that has had a positive impact on this community.
- What changes could be made that might make the board more effective?

Questions for AJC Operators:

- Describe an aspect of your American Job Center that is particularly successful/effective.
- Describe something that has happened at your One-stop for which you are proud.

Questions for Front-line Staff:

- What aspect of your work are you particularly proud of? Can you envision this situation [that you are proud of] happening more often? Are there barriers that keep this situation, or situations like this, from happening more often? What change(s) can you envision that would help remove these barrier(s)?

Questions for Employer-Customers:

- Describe something that has happened through your work with the One-stop that has helped your business. Are there barriers that keep this situation, or situations like this, from happening more often? What change(s) can you envision that could help remove these barrier(s)?
- Would you recommend One-stop services to other employers? Why or why not?

Questions for Job-Seeker Customers:

- Tell about something good that has happened since you got connected to this AJC. Has your work with the AJC helped you succeed? In what way(s)? Are there barriers that keep this situation, or situations like this, from happening more often? What change(s) can you envision that might help remove these barrier(s)?
- Would you recommend AJC services to others? Why or why not?

Key Questions: State Monitoring Tools

- Does your state have monitoring tools that reflect the unique characters of your state's monitoring system and public workforce system?
- Do your state monitoring tools incorporate fiscal, administrative, and program elements?
- Does your state have monitoring tools that incorporate open-ended questions for respondents from multiple levels of the organization and service delivery system (e.g., administrative entity staff, partner staff, line staff)?
- Does your state have a process for reviewing and updating its monitoring tools?
- Does your state solicit input from other units within your state agency to incorporate into the next iteration of monitoring tools?



STATE HIGHLIGHTS

State Highlight: *Arkansas*

Arkansas' Department of Workforce Services has a program and financial monitoring instrument that state monitoring staff use to conduct desk reviews and onsite monitoring visits. Arkansas' monitoring tool is updated annually and includes a review of various program elements, including governance, AJC operations, and core, intensive, and training policies, procedures, and services. Arkansas monitoring staff uses their guide to question multiple respondents, including administrative entity, program managers, and line staff. State staff also speaks with partner-funded program staff members to gain an understanding of how services are coordinated within the local delivery system. One unique feature of Arkansas' monitoring tool is the inclusion of a supervisor training site interview component and a customer interview component. To link to Arkansas' WIA Program and Financial Monitoring Instrument, visit www.Workforce3One.org and search for the webinar entitled "Preparing for the Journey," which is part of the Effective Program Monitoring Strategies Webinar Series.

State Highlight: *Ohio*

The State of Ohio's monitoring tool is noteworthy because of how comprehensive it is in helping monitoring staff to review program elements across the WIA adult, dislocated worker, and youth programs. Ohio's monitoring guide was designed for the explicit purpose of optimizing service quality. Ohio's monitoring guide is updated annually to incorporate information on state waivers and new policy directions from the Ohio Department of Job and Family Services and to ensure that the guide remains as comprehensive as possible. Ohio's guide is organized into three sections: Administrative Review, Adult and Dislocated Worker Program Review, and Youth Program Review, with each section containing a series of questions used to help state monitoring staff assess how policies and procedures have been implemented and how program eligibility is determined and documented. To link to Ohio's PY 2012 Comprehensive Monitoring Guide for WIA programs, visit www.Workforce3One.org and search for the webinar entitled "Preparing for the Journey," which is part of the Effective Program Monitoring Strategies Webinar Series.

STEP FOUR

BUILD STAFF CAPACITY

STEP FOUR:

BUILD STAFF CAPACITY

No matter how well thought-out, comprehensive, and furnished with good tools your state monitoring system is, it can't be put to effective use unless staff members at every level—from your state's workforce development agency to the frontline staff at the AJCs—are well trained, empowered to deliver quality service, and fully aware of the goals of the monitoring system. To ensure that your state monitors, local sub-recipients, and service providers are fully engaged in and understand the importance of overseeing and monitoring their programs, it is necessary, at minimum, to brief them on the state's monitoring system, so that they know how effective oversight and monitoring activities work, how they will help customers and organizations meet their respective goals, and how they will benefit the overall workforce development system. It is also important to ensure that state and local monitoring staff possess the skills and abilities necessary to perform their assigned duties. It is equally important that the monitors have program knowledge, which is a key component to building staff capacity. With the large number of baby boomers retiring, states are in the position of hiring new and equally talented staff, but they are in need of training and ongoing support.

Required Skills and Abilities of Monitoring Staff

Emulating the total quality management approaches used in the private sector, states and local sub-recipients have identified staff capacity-building as part of an organizational strategy to improve overall management and operations. Viewed from this perspective, staff training is an integral part of a larger human resource investment strategy designed to create a "high performance" organization that strives to improve service quality and customer satisfaction. For these reasons, it is important that you assess whether state and local monitors possess the requisite skills to perform their job responsibilities. If skills are lacking, state agencies should set aside time and resources for state and local monitoring staff to be trained in their roles and responsibilities and to improve their knowledge of federal programs.

Monitors often require training on federal and state laws, regulations, policies and circulars, and state monitoring tools. Because laws, regulations, policies, and AJC systems are constantly changing, state and local monitors need to constantly develop new skills and have opportunities to engage with and learn from one another. There are also general skills and workplace abilities that are important for monitoring staff to possess. At a minimum, staff responsible for reviewing and evaluating sub-recipients programs and service delivery systems should have the following skills and should be able apply those skills in their workplaces:

Skills	Workplace Abilities
Critical Thinking —Using logic and reasoning to identify the strengths and weaknesses of alternative solutions, conclusions, or approaches to problems.	Getting Information —Observing, receiving, and otherwise obtaining information from all relevant sources.
Reading Comprehension —Understanding written sentences and paragraphs in work related documents.	Updating and Using Relevant Knowledge —Keeping up-to-date technically and applying new knowledge to the job.

Skills	Workplace Abilities
Active Listening —Giving full attention to what other people are saying, taking time to understand the points being made, asking questions as appropriate, and not interrupting at inappropriate times.	Evaluating Information to Determine Compliance with Standards —Using relevant information and individual judgment to determine whether events or processes comply with laws, regulations, or standards.
Speaking —Talking to others to convey information effectively.	Communicating with Supervisors, Peers, or Subordinates —Providing information to supervisors, co-workers, and subordinates by telephone, in written form, e-mail, or in person.
Active Learning —Understanding the implications of new information for both current and future problem-solving and decision-making.	Analyzing Data or Information —Identifying the underlying principles, reasons, or facts of information by breaking down information or data into separate parts.
Complex Problem Solving —Identifying complex problems and reviewing related information to develop and evaluate options and implement solutions. Also, problem sensitivity is important, which means the ability to tell when something is wrong or is likely to go wrong. It does not involve solving the problem, only recognizing there is a problem.	Interacting With Computers —Using computers and computer systems (including hardware and software) to program, write software, set up functions, enter data, or process information.
Judgment and Decision Making —Considering the relative costs and benefits of potential actions to choose the most appropriate one.	Processing Information —Compiling, coding, categorizing, calculating, tabulating, auditing, or verifying information or data.
Writing —Communicating effectively in writing as appropriate for the needs of the audience.	Identifying Objects, Actions, and Events —Identifying information by categorizing, estimating, recognizing differences or similarities, and detecting changes in circumstances or events.
Coordination —Adjusting actions in relation to others' actions.	Organizing, Planning, and Prioritizing Work —Developing specific goals and plans to prioritize, organize, and accomplish your work.
	Making Decisions and Solving Problems —Analyzing information and evaluating results to choose the best solution and solve problems.

Approaches for Building the Capacity of State and Local Monitors

States should build capacity for state and local monitors in a way that best meets their overall needs (in-person training, online training, job shadowing, etc.). Not only should state monitors be provided with training, but efforts should be made to train local sub-recipient monitors as well. There should be consistency on what information is conveyed and how staff are trained, so that staff across all layers of the system hear the same message. This allows for a common understanding, which facilitates a clear message and clear direction to the state and local monitoring staff in terms of expectations for monitoring activities and communications. Sometimes there is a disconnect between program knowledge and the monitoring process. The local service providers may be more knowledgeable than the state or local monitors, leading to frustration on their part. This is not fair to the staff doing the monitoring, nor to those being monitored, which is why coordination among program staff, mentoring and shadowing activities, and other strategies for alleviating this issue are addressed here.

Approaches that state workforce agencies can use to assist state and local monitoring staff include the following:

- Provide basic orientations on fiscal and program elements that should be monitored on a regular basis. Also, include a description of the state’s vision for its AJC system.
- Designate state teams to conduct joint monitoring activities so that staff members have opportunities to learn and share information with one another.
- Designate one or more state monitors as local site “liaisons,” assigned to interact with local sub-recipient monitors on an ongoing basis about their monitoring efforts.
- Allow state monitors to “shadow” federal staff members—and local monitors to shadow state monitors—so staff members can learn from observing how experienced staff review documents and conduct interviews.
- Have Regional Office or state-level staff members who are program experts available to assist state and local monitors on fiscal and program issues.
- Use existing training materials on WIA program and fiscal elements, such as those available on Workforce3One (www.workforce3one.org) to train staff.
- Contract with appropriate public and private training providers or assist local monitors to identify their own training providers to respond to urgent training needs.

Develop State Oversight and Monitoring Points of Contact

Some state agencies may designate a special unit to conduct monitoring activities, while others may have staff from across multiple units oversee various pieces of their state oversight and monitoring system. Regardless of what approach your state agency takes, it is important that staff understand how their daily work assignments impact the delivery of quality services to jobseekers and employers in the public workforce system.

At a minimum, we recommend that you set up a primary point of contact for sub-recipients. This primary point of contact becomes the liaison with the local sub-recipient and works to foster a trusting and supportive working relationship that emphasizes continuous improvement and identifying issues early on to reduce compliance and quality concerns. As pointed out above, everyone should be on the same page; by providing the locals with a state point of contact, they can be provided with necessary mentoring and guidance, and they can ensure that the right message is being conveyed to those who are being monitored. The goals of this approach are to be proactive, provide clear guidance, and minimize any negative findings.

The following links provide useful training resources for state and local monitoring staff on a wide variety of topics related to WIA, including fiscal and performance reporting, case management, statute and regulations:

http://www.doleta.gov/usworkforce/uswf_nav.cfm#toolkits

<https://etareporting.workforce3one.org/index.aspx>

<https://www.workforce3one.org/page/toolkits>



STATE HIGHLIGHTS

State Highlight: Virginia

While increasing the capacity of the public workforce system to provide quality services, Virginia developed a monitoring network comprised of state and local fiscal and program monitors. Local monitors worked closely with the state staff to review the state’s monitoring tools and to improve the capacity of local area monitors through frequently scheduled discussions on specific monitoring topics. The state and local discussions helped to increase local monitors’ understanding and knowledge of the public workforce system and what components to review on a regular basis. Virginia also established a single point of contact for each local area within the state, which helps the state to build strong working relationships with local staff. Each monitor serves as a consultant for these areas and acts as a “triage” person responsible for identifying areas of additional technical assistance, guidance, or training.

State Highlight: Idaho

State monitors in Idaho have found that training local AJC staff on their monitoring process and protocols helps to create a trusting relationship and alleviates anxiety among local service provider staff about the review. The state monitors conduct detailed conference calls with the local AJC staff to inform them about programs they will review and documents they will analyze onsite. The state has also implemented a peer-review process for participant case files, which has helped to address common mistakes with missing documentation and case notes. This collaboration has helped to increase the capacity of local monitoring staff to conduct their own reviews and has made the monitoring process for the subcontractors less stressful.

Key Questions: Build Staff Capacity

- Has your state developed procedures for ensuring supportive and consistent training for monitoring staff members at the state and sub-recipient level?
- Has your state solicited feedback from key departments at the state level to determine what needs to be conveyed to locals about the process and, when appropriate, solicit input from locals into this process?
- What steps has your state taken to promote agreement to work collaboratively to improve service design and delivery among state and local monitoring staff?
- How does the state solicit feedback from local sub-recipient monitors about how to improve program oversight and monitoring?

STEP FIVE

CONDUCT RISK ASSESSMENTS

STEP FIVE: CONDUCT RISK ASSESSMENTS

Risk assessment is a process used by states to identify sub-recipients and sub-contractors that may be at risk of operating their WIA programs and/or AJCs in ways that could have adverse effects on the state agency, the organization, or customers (i.e., jobseekers or employers). The entities identified as “at-risk” may then be singled out for special interventions, such as more frequent monitoring, onsite reviews early in the program year, and extra technical assistance.

Developing a Risk Assessment Tool

Conducting risk assessments of sub-recipients’ operations and service delivery structures does not need to be a complicated process. If you are a state that functions as a single local workforce investment area, you will develop your risk assessment tool so that you can assign risk to service providers, AJC operators, and possibly to state units responsible for various elements of the AJC system. States with multiple local areas will likely develop their assessment tool to assign risk to local areas and their WIA administrative entities.

Identify Risk Indicators

Meet with your state program, fiscal, and data analysis units to gather information about what indicators place a sub-recipient and its sub-contractors at risk of failing to achieve minimum standards of performance and service quality. The risk indicators should cut across all types of programs (i.e., adult, dislocated worker, youth) and sub-contractors (i.e., for-profits, not-for-profits, governmental entities). The key to effective risk assessment is developing a set of indicators of “risk.”

An indicator is a measurable factor that points to an underlying dynamic or pattern that is a cause for concern, but which is more difficult to measure or observe directly. One of the most common indicators used in risk assessment is timeliness of reporting. If a sub-recipient consistently submits late reports, it is a sign that it does not have adequate systems in place to monitor enrollment and service receipt. Since monitors cannot be present in local offices at all times to observe how sub-recipient’s track service receipt, you need a way of detecting problems in this area. An indicator of dysfunctionality in the tracking of service receipt is late filing of reports. If the sub-recipient/service provider files late reports consistently, it indicates problems in the tracking of service receipt. The timeliness of report filing is something monitors can easily determine, and they can do so remotely. Note that an indicator like timeliness of report filing can be both an indicator of a deeper problem and a problem in itself (late reports make monitoring harder).

Construct Questions for Each Indicator

In constructing an assessment tool, the measurement of an indicator, like timeliness of report filing, is operationalized via a question. The question can be as simple as, “Are program reports submitted in a timely manner?” It is important to note that the question is logically distinct from the indicator to which it is attached. In many instances, any particular indicator can be measured via more than one question, depending on what kind risk-assessment model is being used. Because there are many different and distinct aspects of formulating a risk assessment tool, we recommend you sit down with staff from across your organization to brainstorm the best way to assess risk in your state based on how you operate your programs.

Below is a description of the steps you might take to begin the process of developing a risk assessment tool and process

1. Determine what aspects of program operation/administration can have important negative effects on customers and the workforce system if they are handled poorly. Categorize these aspects (e.g., financial management, service delivery, communication) to make it easier to see that you've covered all the relevant and important areas.
2. Determine what easily-measured indicators can be used to detect underlying problems (e.g., timeliness of reporting, staff turnover, changes in contractors). Because each indicator can indicate problems in more than one area, and each kind of problem can be detected by more than one indicator, it is important that you understand these connections when developing your questions. It is also important that you make sure that you have a good theoretical reason for saying that a particular indicator actually does point to a particular variable.
3. Figure out what kind of risk-determining model you want to use. Do you simply want to divide entities into two groups (at-risk and not)? Do you want three groups (no risk, moderate, high-risk)? Do you want a more finely tuned system that assigns every entity a risk score from 1 to 10?
4. The decision for #4 determines how the questions get translated into a quantification system. We recommend that the questions identified be easy for all staff to answer, so that there is consistency in how you interpret and respond to the questions.
5. Develop questions that operationalize all the indicators you've decided to use and that align with the quantification system you want to use (e.g., yes-or-no questions where yes answers equate to risk, 3-point scale, 10-point scale). If you are using a multiple-numbered quantification system, we recommend that you clearly define each response category under the question so there is consistency in how monitors assign risk. For example, if you are asking, "Are program reports submitted in a timely manner?" define what is meant by "timely" (e.g., submitted the day the report is due, 2-3 days after the report is due, more than 3 days after the report is due).

Monitoring staff members in Virginia stated that they are beginning the process of designing a method of implementing risk assessments. They have determined that they will use participant-level data submissions to assess local area and AJC operator risk, but they have not settled on what data elements will be reviewed and how risk scores will be assigned. To begin the process of incorporating risk assessment into its oversight and monitoring approach, Virginia is currently planning to hire a data analyst to help the oversight and monitoring staff use information that is already collected in the state's MIS to evaluate local program operations and services.

This is what is involved in developing a risk assessment tool. A further step might be to test the tool to ensure that it works and is reasonably accurate in helping to identify at-risk sub-recipients/service providers. Once you have determined a sub-recipient's risk, you will need to decide what remedies and responses you are willing to take.

Using Risk Assessment Tools

Once you have developed your risk assessment tool, you can begin the process of determining which sub-recipients or service providers may be at risk of operating their WIA programs and/or AJCs in ways that could have adverse effects on fiscal or programmatic performance and operations. Based on the answers provided on the risk assessment tool, you will be able to identify which sub-recipients/service providers have a risk of not meeting the requirements under each of the risk assessment indicators. The importance of each risk indicator will determine what actions you will take to address the deficiency. Often, you can help sub-recipients/service providers avoid mistakes and compliance issues by providing technical assistance and training. In some instances, however, the risk rating may be such that an onsite review may need to occur immediately to give monitors an opportunity to research and identify the root cause of the problem before technical assistance can be delivered.

The ETA Regional Offices' Approach to Risk Assessment

For the last decade, ETA has required its Federal Project Officers (FPOs) to use an online risk management system, called Grant Enterprise Management System (GEMS), to assess formula and discretionary grantees' risk of doing a poor job of implementing federally-funded grants. ETA's Regional Offices determine risk in five different areas: design and governance; program and grant management systems, financial management systems; service and product delivery; and performance accountability.

There are a number of questions under each of these key areas that FPOs are asked to respond to on a quarterly basis. While FPOs have discretion in how they respond, the questions are set up to help determine whether a grantee has a low risk, moderate risk, or high risk of doing a poor job of implementing their grant(s). Regional FPOs report that the online risk assessment tool helps them to identify which grantees may need more frequent onsite monitoring reviews and technical assistance during the course of implementing their projects and programs. While the system may not be foolproof, it provides the ETA National and Regional Offices with information that can be used to determine whether onsite monitoring reviews are needed or whether technical assistance and training should be provided to a grantee and allows managers and line staff to discuss how to address the risk ratings assigned to grantees. You may be able to incorporate similar questions to assess the risk of sub-recipients in meeting programmatic and fiduciary responsibilities under the WIA into your state monitoring system.

The following areas and questions, which align with ETA's WIA Core Monitoring Guide, come directly from ETA's GEMS.

Design and Governance

- Grantee promotes and facilitates the coordination of workforce, educational, and economic development within regional economies, and supports the local workforce system in regional planning and partnering with business and industry, economic development agencies, and education and training providers. (Strategic Planning 1.11)
- Grantee makes strategic use of its WIA State reserve funds, discretionary Wagner-Peyser funds, and other leveraged funds to support a coordinated statewide effort to develop appropriate workforce solutions. (Service Design 1.26)
- Leadership at the grantee level is constructively engaged with local level leadership, and provides them with the appropriate policy and operational guidance necessary to ensure accomplishment of grant goals. (Leadership 1.41 - 1.42)

- Local Workforce Investment Boards and other local workforce leaders are aligning their workforce strategies with economic development, education, and other local partner agencies within the broader regional economy. (Leadership 1.42)
- Local grantees design their services to participants to develop the skills required to obtain high paying jobs in growth industries. (Service Design 1.27)
- Local grantees are collaborating across youth serving agencies to effectively and efficiently serve the youth most in need. (Service Design 1.28)
- Local workforce agencies have developed policies, practices and agreements that achieve the full integration of WIA, Wagner-Peyser, Trade, and other program services within the American Job Center system. (Program Integration 1.31 - 1.32)
- The grantee has established and enforces minimum standards for comprehensive American Job Centers to assure service quality. (One-Stop Systems 1.51)

Program and Grant Management Systems

- The grantee has comprehensive monitoring tools and procedures in place, and has conducted effective oversight of sub-recipient and grant activities within the last 12 month period. (Administrative Controls 2.12)
- Management and staff essential to administering and operating the grant have been hired, trained, and are functioning effectively. (Personnel 2.23)
- The grantee has written procurement policies and procedures in place that conform to federal and state requirements, and actual procurement practices comply with these policies. (Procurement 2.71)
- The results of audits and monitoring reviews within the last 12 month period demonstrate that the grantee is in compliance with applicable federal requirements, has not incurred questioned or disallowed costs, and has no findings related to significant problems with administration. (Audit 2.8)
- The grantee resolves complaints and sub-recipient audit and monitoring findings in a timely manner, and takes appropriate corrective action to address sub-recipient administrative and operational deficiencies. (Administrative Controls 2.1.6; Audit 2.8)
- The grantee maintains accurate data collection and reporting systems to fulfill financial and programmatic reporting requirements, and to provide timely data for internal management purposes. (Reporting Systems 2.91 - 2.93)

Financial Management Systems

- The grantee tracks the utilization of grant funds at the state and local levels in order to ensure that funds are expended timely to meet program goals. (Budget Controls 3.11)
- The grantee has a cash management system in place that minimizes the amount of cash on hand at the state and local levels. (Cash Management 3.21)

- The grantee issues guidelines, provides training, and monitors its own and sub-recipient expenditures to ensure that costs charged to the various formula grants are allocable and allowable. (Cost Allocation 3.4; Allowable Costs 3.5)
- The grantee maintains a system of internal controls, and monitors its own and sub-recipient operations, to ensure that grant funds are safeguarded against fraud, abuse, and conflict of interest. (Internal Controls 3.6)
- The grantee has financial systems in place to properly account for grant funds, determine if costs are allowed, and report costs on an accrual basis. (Financial Reporting 3.71 - 3.72)

Service/Product Delivery

- Sub-recipients and contracts called for in the state plan are in place and fully operational. (Operating System 4.14)
- All required MOUs and AJC operator agreements are in place; agreements comply with laws and regulations and clearly outline both individual and collaborative agency roles in delivering services. (Operating Systems 4.16)
- Customers have access to the full array of workforce partner services throughout the state's AJC system, either through physical locations or via electronic access. (Integrated Services 4.42)
- The grantee has an effective strategy in place to facilitate service integration (and non-duplication) through staff capacity building and cross training. (Integrated Services 4.42)
- The grantee ensures that local labor exchange and employer services are coordinated to: ensure access to a single, shared job bank, minimize repetitive contacts to employers, and refer the highest qualified jobseekers to employers. (Business Relationships 4.5 & Labor Exchange System 4.6)
- The grantee has a system in place to ensure that covered persons are made aware of and afforded veterans' priority of service for workforce services. (Participant Files 4.21)
- The grantee ensures that sub-recipients effectively coordinate services to maximize opportunities and benefits for participants eligible for both the WIA Dislocated Worker and Trade Adjustment Assistance (TAA) programs. (Integrated Services 4.41, 4.43 - 4.44)
- The grantee has a process in place that ensures TAA participants meet the eligibility timeframes; waivers from training meet the required conditions and are issued appropriately.
- The grantee has a process in place that ensures that Youth services - such as all components of the WIA Youth program, Job Corps, apprenticeship, etc. - are accessible through American Job Centers and coordinated with local education systems. (Integrated Services, 4.41)
- The grantee has established a workforce system that ensures access to integrated services to special populations, such as: Migrant Seasonal Farmworkers, persons with disabilities, older workers, veterans, ex-offenders, etc. (Integrated Services 4.44 - 4.45)
- The grantee maintains a workforce information system that is easily accessible and identifies high-growth jobs and employer skill needs, to provide effective workforce solutions for employers and job seekers. (Labor Exchange System 4.62)

- The grantee ensures that sub-recipients use the workforce information system to effectively assist participants in making training and career choices. (Labor Exchange System 4.42)

Performance Accountability

- The grantee has met or exceeded its negotiated goals for the most recently completed program year. (Performance Outcomes 5.21)
- The grantee's local area sub-recipients have met or exceeded their performance goals for the most recently completed program year. (Performance Outcomes, 5.23)
- The grantee has an effective system in place to measure its own and local area progress toward meeting performance goals, planned activity levels, spending targets, and taking corrective action as needed. (Service Goals 5.1, Performance Outcomes 5.22 - 5.23 & Sub-Recipient Performance 5.3)
- The grantee has a system for providing technical assistance to local area sub-recipients when performance is below planned goals or to make adjustments to program operations when necessary. (Performance Outcomes 5.23 & Sub-recipient Performance 5.31)
- The grantee holds local area sub-recipients accountable for meeting performance goals by initiating corrective action, and when appropriate, imposing sanctions against routinely low performers. (Sub-recipient Performance 5.32)
- Trends in program area expenditures over the most recent three-year period indicate the State grantee is likely to achieve a minimum 70% expenditure rate. (Performance Data 5.41 - 5.44))
- The grantee has an effective process (as demonstrated by current expenditure levels) to ensure that statewide (15% and Rapid Response) funds are fully allocated, expended and reported. (Service Goals 5.14)
- Current levels of spending indicate that 30% or more of youth funds are spent on out-of-school youth. (Service Goals 5.12)

Based on the FPO's responses, each of the questions above receives one of three risk ratings—red for high risk, yellow for moderate risk, or green for low risk. Based on the individual color codes assigned to each question, the online system will assign a red, yellow, or green risk rating to the primary risk categories. Built into the system is an algorithm, which assigns an overall risk rating to the grantee (i.e., green, yellow, or red). FPOs can change the overall risk rating if they add a comment explaining why the risk rating was changed and they provide documentation supporting the change and list their information source(s) for such a change.

Key Questions: Risk Assessment

- Would it be prudent for your state to consider adding the use of risk assessments to target monitoring activities and/or technical assistance?
- What are the most common indicators that place a sub-recipient at risk of not meeting statutory or regulatory requirements in your state (e.g., use of new service providers, size of the geographic area, funding levels)?



FEDERAL & STATE HIGHLIGHTS

Federal Highlight: *AGA Partnering for Intergovernmental Management and Accountability*

The AGA Partnering for Intergovernmental Management and Accountability developed a risk assessment monitoring tool that you can use to assess a grantee's risk. The risk assessment monitoring tool is the result of an intergovernmental partnership established by AGA in cooperation with the U.S. Office of Management and Budget (OMB). The tool is intended to be used across federal grating authorities, as well as monitoring authorities, and provides you with a method for assessing sub-recipient risk. If you are interested in incorporating a risk assessment review into your state's monitoring strategy, the AGA tool may be a good starting point for you because it can be customized to incorporate additional program compliance risk factors, especially ones related to workforce programs and the AJC system. The tool is available for downloading at <http://www.agacgfm.org> under the *Tools and Resources* heading.

State Highlight: *Ohio*

The Department of Job and Family Services, Office of Fiscal Services, Bureau of County Finance and Technical Assistance, developed a tool that staff use to assess the risk of grantees related to fiscal and administrative requirements. This tool uses a graphic scale to rate a sub-recipient's risk rather than a yes/no or numerical rating scale. To view the tool, visit <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>.

State Highlight: *Colorado*

Colorado developed a program guidance letter (PGL) on Annual Compliance Monitoring and Risk Assessment available for downloading at <http://www.coworkforce.com/PGL/pgl/PGL0818WIAAnnualCompMonitoringGuidelines.pdf>. Colorado's Department of Labor and Employment (CDLE) developed the risk assessment tool to formalize its ongoing evaluation of risk and to make it an integral part of the state's annual compliance monitoring process. Colorado uses its risk assessment process to identify sub-recipient risk, evaluate the risk of issues uncovered during the onsite review, and to determine whether technical assistance should be initiated.

State Highlight: *Pennsylvania*

The Commonwealth of Pennsylvania has a state policy that encourages local areas and their administrative entities to assess whether local AJCs are meeting the employment and training needs of job-seekers as well as employers' needs for skilled labor by developing a risk assessment tool to evaluate sub-recipients and AJC operations. The Commonwealth recommends that local monitoring staff customize the risk assessment process to meet their own needs, but at a minimum be able to address the following questions:

- Which contractors involve the most risk exposing the local board to adverse consequences?
- What is the vulnerability of the local area and local board of the contractor compliance on fiscal and programmatic requirements is monitored less frequently (i.e., less than annually)?
- Has the contractor experienced major changes in personnel or practices since the last review?
- Is there a history of disallowed costs or eligibility issues?
- Is there a history of prior monitoring and audit issues?
- Does this contractor have a large share of the local area's allocation?

Based on the responses, the local area assigns either a low or high rating to each of its service providers. The state requires service providers that receive a high risk rating to be monitored annually and the low risk service providers to be monitored every other year. For additional information, visit <http://www.portal.state.pa.us> and search for WIIN No. 3-00 entitled, "Local Area Monitoring Guidelines."

STEP SIX

CONDUCT DESK REVIEWS

STEP SIX: CONDUCT DESK REVIEWS

A desk review is a formal process of collecting and analyzing information and documents submitted electronically by a local sub-recipient or sub-contractor. The remote nature of the review—it is literally conducted at your desk—distinguishes it from the onsite review described in Step Seven. Because they do not involve travel, desk reviews are a key component of most states’ monitoring systems. They help you use limited resources efficiently and maximize the time spent conducting onsite reviews. Beyond the basic data-collection role they play in any monitoring system, desk reviews can also be key features of comprehensive monitoring systems focused on continuous improvement of the workforce system. They become so when you use them to help prepare for more in-depth onsite monitoring visits or to stay in continuous “contact” with the entities you are monitoring.

Using Desk Reviews to Prepare for Onsite Monitoring Visits

Most state-level monitors use desk reviews to prepare for their onsite monitoring visits. It makes sense to use the various pieces of information you collect during a desk review to help familiarize yourself with the sub-recipient and any issues it may have before you visit its offices in person. There are different levels of preparation, however, and the comprehensiveness of your preparation has a direct relationship to your ability to conduct the onsite review incisively and efficiently. In addition to reviewing data on service receipt and use of funds, you may want to use the occasion of a desk review to learn about a sub-recipient’s policies and procedures and organizational structures. You may also want to review past monitoring reports and assess the accuracy and timeliness of fiscal and programmatic reports.

“The desk review is my opportunity to see what the local area is doing and to identify areas that require a more in-depth review during my onsite monitoring visit.”

Exhibit I provides a list of documents that you can review at your desk to prepare thoroughly for an onsite monitoring visit.

Exhibit I: Documents to Review in Preparation for an Onsite Monitoring Visit

Item
<input type="checkbox"/> Organizational Chart, including list of local board staff
<input type="checkbox"/> Roster of Local Board members and their affiliations
<input type="checkbox"/> Local Board by-laws
<input type="checkbox"/> Local Board/Chief Local Elected Official agreement
<input type="checkbox"/> Roster of Youth Council members and their affiliations
<input type="checkbox"/> American Job Center Agreement and list of centers, including designation (i.e., comprehensive, satellite. Mobile/access point)
<input type="checkbox"/> Most current local plan
<input type="checkbox"/> Administrative policies and procedures, such as those pertaining to Priority of Service -- Supportive services -- On-the-Job Training

Item
-- Individual Training Accounts
-- Customized Training
-- Work Experience
-- Grievance Policy and Procedures
<input type="checkbox"/> Fiscal policies and procedures
<input type="checkbox"/> Copies of Local Board meeting minutes
<input type="checkbox"/> Copies of forms and checklists used by frontline staff
<input type="checkbox"/> List of all WIA service providers (Adult, Dislocated Worker, and Youth)
<input type="checkbox"/> Copies of local monitoring reports and corrective action plans
<input type="checkbox"/> Copies of contracts, memorandums of understanding, & resource sharing agreements
<input type="checkbox"/> Approved Indirect Cost Rate, if applicable

A review of these documents helps you to gain a better understanding of the sub-recipient’s vision and plan for workforce programs. This is especially important in states where the state agency allows a lot of flexibility in how programs are operated. An annual review of these documents gives you a good sense of the “lay of the land” and helps you to map out specific areas to review with sub-recipient staff members during the onsite monitoring visit.

The steps for using desk reviews to prepare for onsite monitoring visits include the following:

Step 1: Send a list of required documents to the sub-recipient. We recommend that sub-recipients submit electronic versions of the documents so that you can more easily catalogue and access the files. We also recommend that you collect materials at least one month prior to the onsite review so that you have enough time to review and prepare follow-up questions for the onsite monitoring visit.

Step 2: Collect materials and review materials at your desk. We also recommend that you review the sub-recipient’s website to gather information as well. Many of the documents you will request are available on the Internet, so to save time it is best to do a thorough review of the sub-recipient’s website before making the formal request in Step 1 above.

Step 3: Prepare follow-up questions for program staff that can be reviewed during the onsite monitoring visit. You may identify issues in the following areas:

- **Strategy:** These are questions or concerns related to vision, priorities, and service design and policy development.
- **Operations:** These are questions and concerns related to actual service delivery and day-to-day operations, such as staffing levels, coordination of services with partner programs, and funding levels for AJC operations.
- **Performance:** These are questions and concerns related to enrollment levels, performance outcomes, and expenditure levels.

Using Desk Reviews for Frequent Program Monitoring

In many states, the monitoring of a particular sub-recipient or sub-contractor consists of a single annual desk review and a single annual onsite review. Outside of the communication and contact taking place in relation to these discrete events, the state monitoring staff and the sub-contractor remain relatively isolated from each other. Although this level of contact satisfies formal requirements, it does not necessarily further the goals of the

monitoring system. Monitors can stay much better connected to local sub-recipient and sub-contractor operations by adapting the desk-review process and making it into a tool for more systematic and continuous monitoring. Exhibit II provides a list of documents that you can review with greater frequency to stay connected to local sub-recipients' operations.

Exhibit II: Documents to Desk-Review with Greater-than-Annual Frequency

Item
<input type="checkbox"/> Quarterly Financial Reports
<input type="checkbox"/> Quarterly Program Reports
<input type="checkbox"/> Workshop Listings and Availability
<input type="checkbox"/> Review of Recently Issued ITAs
<input type="checkbox"/> Review of Recently Issued OJTs

We recommend that as part of your oversight and monitoring strategy you conduct desk reviews of participant and financial information every quarter. You can also review quarterly submissions of WIA and Wagner-Peyser data to see if sub-recipients are meeting expected levels of performance and what types of services are being provided to customers. A quarterly review of these documents helps you to stay connected to local program operations and to determine if enrollment levels are low relative to expenditures. As noted above, quarterly desk reviews can be incorporated into your risk assessment process.

Quarterly reviews can help improve your responsiveness to difficulties and issues. If, for example, you see a large spike in OJTs after reviewing a sub-recipient's data, you can immediately have an in-depth telephone conversation with the sub-recipient to ensure that they understand the requirements related to OJTs (e.g., duration and wage limits, supervision) and are abiding by state policies and procedures. If there are issues, you will have taken steps to deal with them before they get out of hand.

To stay better connected to local program operations, you may want to consider doing the following:

- Step 1:** Develop state policies and procedures outlining how quarterly desk reviews will be conducted. Share the state policy with sub-recipients so they are aware of what information will be reviewed and whether specific pieces of information must be submitted to you. The policy could also describe to whom the information should be submitted and when the information is due. It is highly recommended that the state develop a set schedule at the beginning of each Program Year (PY) or grant cycle so that local administrative entities are aware of the state's requirements.
- Step 2:** Make an effort to gain access to sub-recipient reports, such as quarterly fiscal and programmatic reports. You can also make formal requests of sub-recipients via email or form letter. Your email or letter should state that the information collected will be used to support your oversight and monitoring efforts and to identify areas requiring technical assistance and training.
- Step 3:** Review and analyze the information submitted and prepare follow-up questions for the sub-recipient. You may identify issues that relate to the areas identified above (strategy, operations, performance).
- Step 4:** Conduct quarterly calls with sub-recipients to discuss quarterly desk review issues and to be updated on local program operations.



STATE HIGHLIGHTS

State Highlight: Colorado

Local areas in Colorado use the state MIS, “Connecting Colorado,” for case management and reporting of participant data. State program monitors review case files at their desks to get a sense of case manager/customer interaction, service receipt, and common employment barriers. Local areas’ use of the state MIS allows monitoring staff to conduct real-time reviews of services received and eligibility documentation. The significance of this process is that it is truly continuous, allowing state monitors to review information daily, as needed, so that they can communicate concerns quickly with local areas as they arise. Another benefit of the state MIS is that it allows state monitors to save time and limited travel resources during their onsite reviews because materials normally reviewed onsite can now be reviewed at their desk.

State Highlight: Maine

Technology has changed the way the state of Maine does their work—it’s made it easier and more efficient. Maine is using a proprietary system called “Empyra.com” that allows case managers and customers to have online interactions with one another and also helps state monitors to track and oversee local program operations. This system is flexible enough to allow jobseekers, local AJC staff and state agency staff to interact with each other and for monitors to access management reports. When the RFP was developed, Maine requested that features be built directly into the system to help monitors oversee program operations. Maine’s case management system helps monitors to spot trends, allowing the state to target assistance quickly to local sub-recipients.

State Highlight: Massachusetts

The state of Massachusetts has also been using an advanced case management system containing multiple databases fed by a more comprehensive set of collection fields. They feel this is the fastest way to correct problems and provide technical assistance. They are able to view multiple data sets that enable them to spot trends and issues quickly, cut down travel time, alert staff and managers throughout the state, and respond electronically to small issues before they become larger. Program staff are also able to access this information from their desks. This has been useful while building a cross-trained team and staying abreast of compliance issues. Their system has cut down on the need for meetings, as they are able to communicate in real time with all staff. It has been an excellent tool, as funding cuts have made it a necessity to use their system for program function and reporting. Massachusetts demonstrates progressive intentionality as they build a solid system for their state team.

Key Questions: Desk Reviews

- Are your monitoring funds limited? If yes, could you use desk reviews to maximize time spent onsite conducting monitoring visits and streamline your oversight and monitoring responsibilities?
- Do you have policies and procedures that incorporate the use of desk reviews? How could desk reviews be used by your state to conduct more systematic and continuous monitoring?
- Do you have the capability to review participant case files electronically? If yes, how does the state incorporate electronic case file submissions into its data validation and program monitoring activities? If no, would the state consider adding this functionality into the state MIS to help monitors oversee local program operations?

STEP SEVEN

PREPARE FOR & CONDUCT ONSITE MONITORING REVIEWS

STEP SEVEN: PREPARE FOR & CONDUCT ONSITE MONITORING REVIEWS

It is important for you to establish procedures and clear instructions for sub-recipients about what to expect for onsite monitoring visits. Explaining the goals of the monitoring review and how information collected will be used by you helps your sub-recipients to understand the importance of the monitoring visit and alleviates misconceptions and concerns about the visit. Also, by having clearly articulated instructions, you can feel confident that sub-recipients will be prepared for your visit.

Preparing for the Onsite Monitoring Visit

Our review of state monitoring practices revealed that many monitors do not set aside enough time to prepare for onsite monitoring visits. The following steps are important to incorporate into your state's process for preparing to conduct the onsite monitoring visit.

- **Send Notification Letter:** You should send a letter notifying the sub-recipient of the monitoring visit, with a list of documents you will review prior to the site visit and a list of documents that you will need while onsite. We recommend that you include a draft schedule and some criteria you will use to identify which local AJCs to visit.

You should alert the entity being reviewed as to any records, data, or documents that are required for the onsite review but that can only be made available on-site, such as source documentation for quarterly financial reports and eligibility documentation for program services. To the extent possible, the sub-recipient should provide requested documents in advance. When this is not feasible, the requested information should be readily available, in an organized manner, at the time of the onsite review.

Note: If your state is a single local workforce investment area, you will want to notify the service providers and AJCs of your visit and also work to identify which state units will be part of your review process.

- **Establish and Finalize Schedule:** You should initiate a telephone discussion with the sub-recipient to discuss which local AJCs should be visited and how many case files will be reviewed at each center. It is also helpful for you to identify which local staff will participate in the onsite interviews. You should schedule any appointments/ interviews prior to arrival at the sub-recipient's location. When the review encompasses a visit to a service provider location or AJC, very specific arrangements should be made in advance. Note: Do not assume that the sub-recipient has communicated the dates and times of the onsite monitoring review with AJC and partner staff. It is always important to involve the local administrative entity, their service providers, and AJC partner staff in customizing the site visit schedule. Exhibit III contains an example of a detailed onsite review program monitoring schedule.

Exhibit III: Onsite Program Monitoring Review Schedule

Day	Location	Time	Elapsed time	Activity
Day 1	LWIA Admin. Entity	8:30 - 11:00	2.5 hrs	Interview with LWIA A/DW Program Lead
		11:00 - 12:00	1 hr	Interview with LWIA Youth Lead
		12:00 - 1:00	1 hr	Lunch
		1:00 - 3:00	2 hrs	LWIA Business Lead
		3:00 - 4:30	1.5 hrs	Interview LWIB Staff
		4:30 - 5:00	30 min	Exit Interview with prime LWIA contact
Day 2	AJC	8:30 - 10:30	2 hrs	Interview with WIA Manager
		10:30 - 12:00	1.5 hrs	Local Business Services Staff, WIA, and possibly ES
		12:00 - 1:00	1 hr	Lunch
		1:00 - 1:30	30 min	Observe Resource Room or Customer Appointment
		1:30 - 2:00	30 min	Interview Resource Room Customer
		2:00 - 4:30	2.5 hrs	Review Participant Case Files and MIS
		4:30 - 5:00	30 min	Exit Interview with AJC WIA Manager
		5:00		Travel
Day 3	AJC	8:30 - 10:30	2 hrs	Interview with WIA Manager
		10:30 - 12:00	1.5 hrs	Local Business Services Staff, WIA, and possibly ES
		12:00 - 1:00	1 hr	Lunch
		1:00 - 1:30	30 min	Observe Resource Room or Customer Appointment
		1:30 - 2:00	30 min	Interview Resource Room Customer
		2:00 - 4:30	2.5 hrs	Review Participant Case Files and MIS
		4:30 - 5:00	30 min	Exit Interview with AJC WIA Manager
		5:00		Travel

- **Study Desk Review Materials.** You should analyze desk review materials prior to the site visit, noting areas that staff would like to discuss during interviews with local administrative and service provider staff. This includes reviewing past monitoring reports and the sub-recipient’s website to review any background information (*See Step 6 Conduct Desk Review for more information about this part of the process*).

- **Gather Input from Other State Units.** Another important step in preparing for the onsite monitoring visit is for your state monitoring staff to hold conversations with other units within the state. This step is especially important in states that have stand-alone monitoring units whose primary responsibility is monitoring local fiscal and program areas. Units that should be involved in the discussion include fiscal, program, and MIS.
- **Review State Monitoring Tool.** You should review and familiarize yourself with the monitoring tools you will be using during the site visit. This helps you to gain a better understanding about the questions you will be using with various respondents. It also helps you to highlight areas that you may want to pay particular attention to during the onsite monitoring review.
- **Confirm the Site Visit Dates.** Two weeks prior to the site visit, we recommend that you contact the sub-recipient to confirm the site visit dates and times and see whether there are any questions/concerns. This is also the time to request any outstanding documents that have not been submitted for review.

The Components and Tools of an Onsite Monitoring Visit

While there is some variability in the flow of state monitoring visits, there are four main components to an onsite review. A brief description of each of these components is provided below.

- **Entrance Meeting:** The onsite review begins with your arrival to the sub-recipient’s office. A brief entrance conference provides you with an opportunity to review the onsite agenda, discuss the purpose of the visit and planned deliverables, and to address any questions. If needed and appropriate, the entrance conference also gives the sub-recipient time to make alterations to site schedule. Changes to the site schedule are sometimes needed because emergencies arise, so some concessions may need to be made.
- **Interviews:** Once the entrance conference is completed, you should have an opportunity to discuss program operations with key personnel at the sub-recipient level. Conducting interviews across multiple respondents at the local level (i.e., local board staff, AJC operator, WIA program operators and line staff, customers) helps you understand how services are being delivered and whether they are being sequenced in a way that meets the needs of local jobseekers. Similar questions should be asked across multiple respondent groups in order for you to understand whether there is consistency in local staffs’ understanding and implementation of key program areas. Appendices D and E contain examples of customer interviewing protocols.

According to one state official, “some states think that developing a monitoring tool is the answer to their oversight and monitoring issues. While a comprehensive tool is important, it is also important to ensure that every layer of the state agency understands its role in sharing information across units so informed decisions can be made about how local sub-recipients should be operating their programs.”

Key Question: How is your state coordinating its monitoring approach to include input from state program, fiscal and performance units?

- **Observations:** Program evaluators often use observations to assess program elements, such as observing jobseekers’ use of the resource room and how customer questions/concerns/referrals are addressed, observing an intake session, and observing a customer and case manager meeting. You may want to consider incorporating time into your onsite review to observe how services are being delivered. One advantage of using observations is that it allows for a lot of flexibility and can be easily fit into an onsite monitoring visit. The main disadvantage is that it is limited to behavioral variables—staff performing the function—and may not be easily quantified. Appendices F and G contain examples of observation protocols.
- **Case File Reviews:** If you cannot review participant case files at your desk, the site visit affords you the opportunity to examine them. A careful review of participants’ files can help you determine whether program eligibility requirements are being met, how services are sequenced, and how much interaction customers are having with case managers. It is highly recommended that you review case files from a variety of programs (i.e., adult, dislocated worker, and youth) and customers (recently unemployed, long-term unemployed, enrolled in training).
- **Exit Conference:** The exit conference is an opportunity for you to address any outstanding issues, discuss promising practices and identify technical assistance and training needs. The exit conference also gives you an opportunity to discuss the timeframes for submitting the written report and for sub-recipient’s submission of a corrective action plan, if this is necessary. **Note:** The exit conference may also be used to explore compliance issues that surfaced during the onsite review. If you take this approach, remember you are simply presenting impressions, not engaging in a debate with the sub-recipient staff.

Reviewing Key Program Elements

ETA’s WIA Supplemental Monitoring Guide describes a number of key program elements that should be reviewed during your onsite monitoring visits. An effort has been made to identify quality components within each of these review elements, but the list is not exhaustive. The program elements described below will need to be tailored to meet the unique circumstances within your state for operating WIA programs and operating the AJC system. Note: Some states operate as single local workforce investment areas; if you are in one of those states, it is important that you review state policies and procedures to ensure that state personnel are abiding by WIA statutory and regulatory requirements and meeting identified state priorities and policies. Some of these elements are best evaluated by collecting information in interviews; others are best explored through observation or desk reviews. The decision about what method to use to collect information is best confronted by a group of state and local staff with knowledge and expertise in program monitoring. With this said, there are five primary program areas that you should review during your onsite monitoring visits. Each is covered below.

Design & Governance

It is important to evaluate a sub-recipient’s capacity to design and govern its programs in a way that satisfies the needs of both employers and participants. WIA allows for a tremendous amount of state and local flexibility in the design and governance of public

Staff across the ETA Regional Offices commented that states do a good job of reviewing administrative and financial compliance components, but they were hesitant to say the same about states’ review of WIA program components and American Job Center service delivery systems.

workforce programs. State and local boards are supposed to oversee program operation and service delivery and ensure that they are demand-driven—that is, that they meet the needs of employers for a qualified and competitive workforce while preparing jobseekers for the jobs and careers that are in demand. To ensure that state and local boards are following this intent of the Act, you must review how policies and procedures are established and what roles the local board members and chief local elected officials play in this process.

Key Compliance Elements

- Business representatives constitute a majority of the local board
- Local board meets the composition requirements in WIA Section 117(b)(4)
- The local area has an approved local plan
- The local board is actively engaged in building relationships with businesses to create a demand-driven system
- Local Youth Council meets membership requirements
- Rapid response services are coordinated with the state agency

Selected Elements of Quality

- New local board members receive an orientation to their roles and responsibilities
- Partner services are well-integrated into the local AJC system
- Program Integration is used to define policies, systems, and service design that reduces duplication, maximizes resources, ensures customer service, and reduces overhead
- Sub-recipient has consulted with business leadership in forming its strategy
- Organization coordinates with economic development and workforce development organizations
- Sub-recipient has identified high-growth industries and workforce needs and has designed services around these high-growth industries and occupations

Program and Grant Management Systems

Program and grant management systems support grant functions and activities that are necessary for the operation of a project but are not related to the direct provision of services. These grant functions include personnel, oversight, policy development, management information, and reporting systems. You should work to ensure that sub-recipients have the capacity to perform the broad array of management functions that are necessary to operate federally-funded workforce development grants.

Key Compliance Elements

- The local area monitors its service providers to ensure that they are complying with federal, state, and local policies and procedures
- The local areas have a process for developing and issuing local policies and procedures
- MOUs have been executed with all AJC partners, and resource sharing agreements (RSAs) are in place
- Processes are in place to review and update MOUs and RSAs agreements

Selected Elements of Quality

- The local administrative entity has a staffing plan that fulfills capacity for key areas, such as executive, fiscal, MIS, and program operations
- Staff positions are filled with individuals that possess proper qualifications that match job responsibilities
- Staffing levels are adequate to handle customer flow
- Local administrative entity has a process for ensuring that partners are carrying out services described in their MOUs and RSAs

Financial Management Systems

The financial management systems that a sub-recipient has in place—those relating to budgets, case management and disbursal, program income, cost allocation, allowable costs, internal controls, and financial reporting—must function in a way that protects sub-recipient assets.

Key Compliance Elements

- Process for tracking planned expenditures against actual expenditures is in place
- Sub-recipient has proper cash management, program income, cost allocation, and internal financial control procedures in place

Selected Elements of Quality

- Sub-recipients have opportunities and ways to re-allocate funds across sub-contractors
- Sub-recipients have mechanisms in place to track and monitor training obligations and payments

Service/Product Delivery

The purpose of this monitoring component is to evaluate your state's and sub-recipient's ability to effectively delivery services to participants and employers. There are many compliance-related elements that apply to WIA programs (program eligibility criteria, types of services available, sequence of services, etc.), so you should review and ensure that local sub-recipients are meeting the intent of the WIA.

Key Compliance Elements

- Sub-recipient has policies and procedures related to priority of service
- Sub-recipient has a process for determining customer eligibility prior to service receipt
- Sub-recipient is offering required services under the WIA core, intensive and training services
- Customers have a signed and completed IEP

Selected Elements of Quality

- Customers are quickly and easily moved through the tiers of service
- Partner programs are well integrated into the AJCs, and co-enrollment is encouraged
- Service design limits duplication, maximizes resources, ensures customer service, and reduces overhead
- Sub-recipient has identified high growth industries, and workforce needs and services are designed to respond to these areas
- Wagner-Peyser, TAA, and WIA services are seamlessly delivered to TAA customers

- Assessments are utilized to match participants with appropriate service options
- Individual service strategies are reviewed and updated frequently to align with customers' goals and needs
- Case notes reflect service delivery that corresponds to IEP
- An ISS identifies and meets the specific needs of each participant
- Need for support services was documented, and those services are being provided per the IEP
- The organization tailors the delivery of its services and products to meet the needs of business
- Customers are actively managed through the follow-up period

Performance Accountability

Accountability of how WIA funds are used to support the AJCs and service delivery within the centers is very important. While the DOL is interested in knowing whether your state and local areas will meet their negotiated levels of performance, it is also important for states to assess whether they have a system in place to collect, analyze, and use data to inform decision-making at all levels of the organization.

Key Compliance Elements

- Sub-recipient on track to meet negotiated performance levels
- Sub-recipient collects participant information and records it in state MIS
- Sub-recipient meets federal reporting deadlines

Selected Elements of Quality

- Sub-recipient uses program, fiscal, and performance information to guide service design and delivery
- Sub-recipient data is shared with staff at appropriate levels
- Sub-recipient tracks sub-contractor performance and requires corrective action, when necessary
- Sub-recipient collects customer satisfaction information and uses it to improve service design and delivery

Reviewing Participant Case Files

Participant case files reviews are an important component of your monitoring approach. Participant case file reviews can be incorporated into your desk review or onsite monitoring processes. Your ability to review participant case files at your desk is dependent upon whether the case files exist in a MIS that monitors can access remotely. Regardless of the approach used to review case files, it is important to develop a process for selecting participant case files to review and a case file review tool so that there is consistency in how case files are monitored.

Case file reviews are important for three primary reasons: (1) to support compliance with program eligibility requirements in the statute and regulations, (2) to document customer/case manager interactions, and (3) to ensure that state report submissions to the DOL are accurate and reliable. If documentation is not present in a customer's case file to support an individual's eligibility for a WIA program, funds spent could be disallowed. Case file reviews also provide you with important information about jobseeker and case manager interactions. This information provides you with an opportunity to assess whether case management services are sufficient and address the employment and training needs of customers. Finally, case file information can be used during the

data element and report validation process to ensure that information is being entered correctly by sub-recipients in the state's MIS and that controls are in place to ensure timely and accurate data entry. Many states compare information maintained in their state MIS or the local sub-recipient's MIS to the information contained in the participant case file to ensure that information used in the state's federal reports is accurate and reliable.

Reviewing participant case files is an important way of assessing whether sub-recipients are providing effective case management to customers in the AJCs. If the sub-recipient is providing effective case management, evidence of this should be present in the case notes and the record of services received.

What is effective case management? A special work group convened by the Employment and Training Administration (ETA) of the U.S. Department of Labor says that effective case management consists of the following:

- Services tailored to individual participant's needs, abilities, skills, and interests as well as to the opportunities and supports available in the community where customers are located (or to which they might relocate);
- Supportive relationships with participants, via a person-centered approach, in which case managers assist participants in making key decisions and in meeting requirements and milestones, by using such techniques as active listening and celebrating customer successes;
- High-quality, specialized knowledge and guidance relating to occupations, job openings, training and educational programs, as well as on specific requirements in TAA and other programs;
- Easy coordination of services with partner agencies, through knowledge of local agencies and the ability to communicate and share information about participants;
- Seamless transitions for participants between programs and services, when needed, without lengthy, involved, or duplicative processes and information requests; and
- Improved management and information systems (including electronic data systems and related forms, checklists, and procedures) that efficiently facilitate documentation, tracking, and reporting.

If these elements of effective case management are not present, you have a responsibility to work with the sub-recipient to ensure that staff members are properly trained to provide this level of service to customers.

Key Questions: Onsite Monitoring Review

- What is the frequency with which the state conducts onsite monitoring visits? Is the frequency enough to help the state oversee and monitor program operations?
- Does your state work closely with the sub-recipients and/or service providers to set up the onsite monitoring visit? Are there opportunities for improving the state's coordination efforts?
- Does your state look for ways to review the quality of service design and delivery components, not just compliance?
- Does your state seek opportunities to observe how services are delivered and to get feedback from customers?



Because some monitors also provide technical assistance to local sub-recipients, we thought it may be useful to share information about some valuable tools for effective case management available on Workforce3One. The website has a number of presentations on developing IEPs, documenting case management services and writing case notes.

One tool that would be especially useful for local sub-recipients who have poor case notes is the webinar entitled, “Make a Note of It: Documenting Progress through Case Notes.” This webinar and the supporting documents that accompany it can be used to prepare written policies and procedures regarding participant case files.

<https://effectivecasemanagement.workforce3one.org/index.aspx>

STEP EIGHT

COMMUNICATE MONITORING RESULTS

STEP EIGHT:

COMMUNICATE MONITORING RESULTS

As a result of your monitoring efforts, you are likely to have in-depth knowledge of program operations at the local level and how services are structured and delivered in AJCs. This knowledge can help to make a difference in the way services are designed and delivered in the AJCs in your state only if your monitoring findings are communicated clearly and constructively to local administrative entities, AJC operators, and service providers. For this reason, it is important that your state monitoring system have a clearly delineated process for sharing monitoring information in a manner consistent with the goal of continuous improvement.

Methods of Communicating Monitoring Results

There are two primary ways of communicating the results of desk reviews and onsite monitoring visits: to discuss the results in-person during an exit interview and to present them in formal written reports. Most states use both methods in varying proportions. While communicating results verbally during monitoring visit exit conferences is useful and encouraged, it is important for you to document your findings and observations in a written report. However, if there are egregious concerns that would result in disallowed costs, it is highly recommended that you communicate with sub-recipients about these issues when you are onsite so that corrective action can be taken immediately. Additional guidance on the formatting of the written report is provided below under the Formatting Your Written Reports section. Some states' monitoring units have also begun to use web-based briefings and quarterly conference calls to share information with sub-recipients (i.e., local administrative entities, AJC operators, and service providers). Regardless of which means you use to communicate monitoring results, it is imperative that you have meaningful and open lines of communication with your sub-recipients so that they know what needs to be fixed and who they can contact to obtain assistance.

Your communications with sub-recipients should keep in mind the following points:

- **Be consistent and fair.** In order for sub-recipients to feel that they are not being singled out by state monitoring staff, it is important that you develop oversight and monitoring procedures that treat sub-recipients consistently and fairly. For example, if the issue is a finding for one sub-recipient then it should be treated similarly for any other sub-recipient in the state.
- **Be timely.** Your written communications should be timely. We recommend that you hold yourselves to no more than a 30 day turnaround for informing sub-recipients about monitoring results. If it is taking longer than 30 days to get your written reports out the door, then it is important that you begin to have internal discussions about how the process can be streamlined. Again, this is another reason to include various units in the design of your monitoring strategy, because if units understand the role they play in helping local areas succeed, everyone will be on board with a shared vision of being timely and responsive in communicating findings and observations.
- **Be specific.** It is important to be specific in your written report to sub-recipients so they know what areas need to be addressed and what recommendations you have for addressing those areas.
- **Be open.** It is also important to be open and share local sub-recipient monitoring reports with your state policy, performance, and fiscal units so that they can determine whether individual attention should be directed at a sub-recipient or if there is a larger systemic issue that needs to be addressed through state policy guidance and training. It is also helpful to share information about cross-cutting monitoring issues with sub-recipients and local monitors so they can pay attention to these areas as part of their own monitoring efforts.

The Crucial Difference between Findings and Observations

The term *finding* has a very specific meaning in the context of WIA monitoring, one that differs from the meaning normally carried by the term. A finding is a violation of the Act or its associated regulations, federal policies, or OMB circulars. In contrast, issues that are non compliance-oriented are referred to as *observations, concerns, areas for improvement, or recommendations*. In this manual, we refer to non-compliance issues as observations. To have consistency in how you communicate monitoring results to sub-recipients you must first define the difference between a finding and an observation in your written communications to sub-recipients. You must then ensure that state monitoring staff members understand the difference and are able to communicate findings and observations in a consistent manner to sub-recipients.

Many state monitors do not elevate issues to a compliance-related level (that is, they do not make them findings) unless they violate federal statutes, regulations, or policies. If this is your standard practice, we encourage you to reconsider your approach. If oversight and monitoring are going to be used to support continuous improvement, then state laws, regulations, and policies, as well as local policies and procedures, should be considered. Failures to conform with the laws, regulations, and policies at all levels should be communicated as findings in your communications with sub-recipients.

Using the Four Cs

To achieve a consistent approach in communicating information to sub-recipients about findings and observations, we recommend that you use the 4Cs approach. The Four Cs are Condition, Cause, Criteria, and Corrective action. Each element of the Four Cs approach is described below:

- **Condition:** Describe and document any conditions that were found during the desk review and onsite monitoring visit.
- **Cause:** Determine and document the cause of each condition and the reason(s) for the concern(s) observed during the monitoring session. Causes may range from lack of training to inappropriate documentation. If the immediate cause(s) are undeterminable, due to lack of verification/sufficient documentation, omit a description and state that the cause could not be determined.
- **Criteria:** Specify the statutory, regulatory, OMB circular, or state or local policy/procedure that was not met. Any gaps identified must be documented, along with recommendations for reconciliation.
- **Corrective Action:** It is important to specify what corrective action the local sub-recipient should take to remedy the problem and the timeframe for completing the recommended changes.

Formatting Your Written Monitoring Reports

To communicate findings and observations to sub-recipients, we recommend that you develop a written report template that includes the following sections:

1. **Title Page.** To give the written report a professional appearance, a standard Title Page should be developed. You should include the name of the state agency/department, relevant programs, sub-recipient name, and report date.
2. **Executive Summary.** An Executive Summary is a short synopsis that allows the reader to rapidly become acquainted with the information contained in the report. The Executive Summary should be clear, concise,

and brief. The Executive Summary should be no longer than one or two pages and should include the key findings and required actions identified during the review, as well as any promising practices you want to highlight.

3. **Background and Scope of Review.** The Background and Scope of Review is the who, what, when, how, why, and where of the review. This section should include the dates of the review, the sub-contractors and AJCs visited, names of staff members that conducted the review, purpose of the review, programs reviewed, time periods for data covered in the review, and description of any information reviewed.
4. **Findings and Required Action.** Findings are identified issues, policies, or practices that are non-compliant with program standards, other federal regulations and policies, and/or state or local policies or procedures. As described above under the Four Cs section, each finding must include a clear statement of the identified problem and must cite the specific section of the statute, regulation, or policy that has been violated. Each Finding should have a corresponding Required Action. The Required Action should be a clear statement that identifies what the state must see as action taken or documentation provided in order for a Finding to be resolved by the sub-recipient. The Required Action should use direct language, such as “will” or “must.” Step Nine goes into greater detail about sub-recipient requirements for submitting a corrective action plan and your process for ensuring that corrective action is taken.
5. **Observations and Suggestions.** Observations are issues, policies, or practices observed during the review that are negatively impacting the sub-recipient’s ability to effectively manage the program or provide services to participants. They may also be “red flags” or “risk areas” that, if not corrected, could lead to an area of non-compliance in future monitoring reviews. Each Observation should have a corresponding Suggestion for improving the issue/practice. Your sub-recipients should be encouraged, but not required, to implement the suggested action for improving the issue/practice.
6. **Identification of Training Needs & Promising Practices.** Promising Practices are sub-recipient practices or outcomes observed during the review that are sufficiently effective and/or innovative to warrant highlighting in the report. While it is a good practice to identify some positive things to say about a sub-recipient and its program, reviewers should be judicious with their use of compliments in the official monitoring report. Such comments may be inappropriately used or taken out of context by sub-recipients for use in other forums. You may also consider adding a section on training or technical assistance needs identified by the sub-recipient if the state agency plans to address these areas formally in future training events or state policy guidance.

The report should be accompanied by a cover letter that explains that the enclosed report communicates the results of your monitoring visit. The cover letter should be brief and to-the-point, and it should provide the dates of the review, list the programs covered, and state the required receipt date for the sub-recipient’s response. The letter should also note, if applicable, that the report contains significant findings such as questioned costs and critical findings or risk areas identified by the state.



STATE HIGHLIGHT

State Highlight: *Virginia*

Virginia's monitors see themselves as "teachers" who identify issues and give assistance to local operators and service providers to remedy problems. At the end of each program year, the state monitors conduct detailed conference calls with their local areas to discuss the cross-cutting findings and observations from the state's onsite monitoring reviews. Local areas have a chance to ask questions and, as a state/local team, the group tries to identify strategies for addressing the problems. The state monitors also collect local area policies and procedures and create a repository that state monitors can share with local areas, as needed.

Key Questions: Communicating Results

- Do you have a clear process for sharing observations and/or findings in your onsite monitoring visit exit interview?
- Are results from onsite monitoring visits submitted in a written format? Does the state have an approved report template?
- Do you have a process for communicating monitoring results that is timely (i.e., within 30 days or less)?
- Did you make yourself available for questions and feedback during the process?

STEP NINE

MANAGE CORRECTIVE ACTION

STEP NINE:

MANAGE CORRECTIVE ACTION

Once you have communicated the results of your desk and onsite reviews, it is important to develop a process for managing sub-recipient's responses. If there are monitoring findings, sub-recipients should be required to submit a corrective action plan that addresses how they will oversee the required changes. The process of developing a correction-action-plan format is entirely separate from managing the corrective action associated with a specific sub-recipient. For this reason, you must first create a format that you want sub-recipients to use, and then you use it each time a corrective action plan needs to be created. It is also important for states to have a process for reviewing and approving corrective action plan submissions as well as a process for tracking that corrective action to make certain that it has occurred.

Recommended Elements for Corrective Action Plans

To ensure consistency across local sub-recipients and to help with managing corrective action plan submissions, it is important for states to develop a template or standard outline that sub-recipients can use to prepare their written responses to your monitoring reports. Appendix H contains a Corrective Action Plan Tool that you can use with your local sub-recipients. This tool lays out all of the required pieces of information that should be contained in a corrective action plan as well as space for the sub-recipients to submit updates on their progress.

ACTION PLAN:						
CHALLENGE:	CONTROL/FIND ACTION:	WHAT WE WILL DO:	TASKS/ACTIVITIES:	LEAD:	EXPECTED OUTCOMES:	DUE DATE:
			How we will do it	Who is responsible?	What are the goals?	When will it be completed?

For corrective action plans to be useful in helping you determine whether findings will be resolved, we recommend that the following questions be addressed in the sub-recipient's submission:

1. **What will the sub-recipient do to resolve the issue?** The sub-recipient should identify what the issue is and what they will do to resolve the problem. It is recommended that sub-recipients break the solution(s) into discrete, measurable actions that address the root cause and provide a timeline for implementing the changes.
2. **Who is responsible for carrying out the corrective actions?** The sub-recipient should determine who in the organization is responsible for ensuring that the issue(s) are addressed. It is important to have "owners" who are accountable for results.
3. **What is the intended result?** The sub-recipient should identify what the goal is for implementing the corrective action. Sub-recipients should have at least a couple of practical functions describing how the result will address the problem. The response should allow the monitor to see if the sub-recipient truly understands the problem and its causes and the response forces the sub-recipient to be clear about what they are trying to do to resolve the problem. If all of these questions are addressed in the sub-recipient's corrective action plan, you should be able to determine whether the actions to be taken are likely to resolve the problem.

After the corrective action plan is approved, the sub-recipient should communicate with the state monitoring staff at regular intervals to report its progress in implementing the changes identified in its corrective action plan. The

Corrective Action Plan Tool in Attachment H includes a column that sub-recipients can use to report back on their efforts to address the problem.

Managing Corrective Action

Once you have developed a standard corrective action tool for sub-recipients to use, you will want to develop a process for how state monitoring staff will review, approve, and manage sub-recipients' corrective action plans. We recommend that your process incorporate the following steps described below:

1. Upon receipt of the sub-recipient's corrective action plan, state monitoring staff should review the sub-recipient's response to ensure that the planned actions will remedy the finding.
2. After state monitoring staff has completed their internal review, you should provide a written response on the acceptability of the proposed corrective action. We recommend that you give yourself 15 working days to review and accept or reject the sub-recipient's proposed corrective action plan. If the corrective action plan is rejected, state monitoring staff will need to provide additional direction and feedback to the local sub-recipient.
3. Once the corrective action plan has been approved, your state monitoring staff must ensure that the sub-recipient implements the required action as identified in their plan. To ensure that corrective action has occurred, you may need to make a follow-up monitoring visit. If a follow-up visit is appropriate, the review will be designed to determine if the corrective action measures taken were adequate to resolve the noted deficiencies.
4. The state should document the sub-recipient's progress in implementing the corrective action plan. It is important for state monitoring staff to stay in contact with the sub-recipient staff who submitted the plan to provide guidance and any technical assistance that is needed.



STATE HIGHLIGHT

State Highlight: *Virginia*

Virginia monitors usually hold local areas to a 30-day turnaround on submitting their corrective action plans. However, if the state finds that the issue needs to be addressed faster, the state can require the local area to act sooner in submitting their corrective action plan. The state can also require local areas to address any problems within a specified time frame, especially findings that would lead to disallowed costs or could put the local area at risk of legal action. Other states may want to emulate this more proactive turnaround on submitting corrective action plans if the findings warrant it, which will require review on a case-by-case basis.

Key Questions: Corrective Action

- Do you provide sub-recipients with a template for the corrective action plan?
- Do you provide sub-recipients with timelines that specify when the corrective action plan is due and for how long a period the corrective action(s) should be carried out?
- As you develop your findings and request a corrective action plan, have you included all the appropriate players?
- Are you looking at the development of a corrective action plan as an opportunity to provide capacity-building opportunities for staff?
- Will you use this monitoring to look at opportunities to conduct ongoing reviews of policies and procedures?
- Does the state have a corrective action plan management team? If no, which state staff are responsible for ensuring local sub-recipients resolve compliance issues?

STEP TEN

IDENTIFY AND
ADDRESS TECHNICAL
ASSISTANCE NEEDS &
SHARE PROMISING
PRACTICES

STEP TEN:

IDENTIFY AND ADDRESS TECHNICAL ASSISTANCE NEEDS AND SHARE PROMISING PRACTICES

Providing technical assistance and training to sub-recipients is the next logical step after communicating monitoring results and working with sub-recipients on their corrective action plan submissions. Think about all the time you spend monitoring sub-recipients to ensure that they are operating their programs in a manner consistent with federal and state laws, regulations, and policies. Beyond writing a report describing findings and observations at the end of your onsite monitoring visits and working with sub-recipients on their corrective action plan submissions, how does your state agency use the information collected to identify and address technical assistance needs and to share innovative strategies? If you do not have an answer to this question, your state agency should spend some time discussing how its oversight and monitoring efforts can be used to influence systematic change. Working closely with sub-recipients to identify areas where they can benefit from additional assistance and training helps to ensure that issues will be addressed and fixed. Technical assistance and training becomes a vehicle for promoting continuous improvement and, hopefully, preventing issues from cropping up in the future and becoming systemic problems. Your monitoring activities also provide your state monitoring staff with an opportunity to identify promising practices, which can be collected and disseminated to your sub-recipients and service providers to enhance the way services are designed and delivered through AJCs.

Providing Technical Assistance

1. Utilize the following steps to help you identify what strategies you can employ to address problems identified in the state's monitoring report to sub-recipients. Shortly after you complete your monitoring activities, review information collected from fiscal and program reports, desk reviews, and onsite monitoring visits to gather information on the areas of potential improvement. Discussions with state program units (e.g., fiscal, program, MIS), sub-recipients, AJC partners, and customers should help you to identify areas for improvement. Be sure to capture information on the "as-is" state and what the ideal state would look like. Keep in mind, no matter how good the current state is there are always opportunities to improve.
2. Prioritize the areas requiring improvement and strive for pragmatic and incremental change in those areas. Ensure that you are clear on what areas need to be improved and whether state policy guidance will address the issue or whether training (e.g., peer-to-peer assistance, web-based or onsite training) can help influence improvement. Create a timeline for addressing the issue and ensure that you include sub-recipients in the dialogue to ensure that the action will help address the problem.
3. Implement your plan for addressing technical assistance and training needs. Communicate with sub-recipients so they are clear about why your state is providing training and technical assistance and what outcomes you want to see achieved. Establish a communication feedback loop so that open and constructive feedback can be gathered from sub-recipients about policies and procedures they have difficulty implementing. Ensure that guidance and support is available from fiscal, MIS, LMI, and other units within the state to support the effort.
4. Use feedback from sub-recipients to evaluate whether the training or assistance your state agency has provided has helped to improve WIA service delivery and program operations. Use progress metrics as a compass to evaluate the impact of your training and technical assistance efforts. For example, if you decide to

provide training on documenting services through case notes, subsequent monitoring visits and participant case file reviews should show that case note documentation has improved.

There are a number of ways that technical assistance can be provided to sub-recipients. Technical assistance must be customized to address the unique issues or challenges facing individual sub-recipients or groups of sub-recipients. States may determine that monitoring issues can be resolved through comprehensive state policies and procedures that clearly address how local sub-recipients should design and deliver services. In some cases, however, subject matter experts within federal, state, or local agencies will need to be utilized to develop and deliver training or to assist sub-recipients in identifying operational or procedural improvements that can be incorporated into their program design. One practice utilized by many states is to identify sub-recipients that are doing things well and to link them to an under-performing sub-recipient to engage in peer-to-peer assistance. Peer-to-peer technical assistance is usually very cost-effective and helps local sub-recipients within your state create linkages and networks with other organizations operating similar types of programs. In other cases, contractors with specific expertise may need to be hired to work one-on-one or in groups to help address findings and observations from state monitoring activities.

Incorporating Technical Assistance into a Continuous Improvement Cycle

Monitoring can be used to improve the ways programs are designed and delivered. Continuous improvement is a quality philosophy that assumes further enhancements are always possible and that processes should be constantly evaluated and re-evaluated. Seeking opportunities to continuously improve your WIA programs results in better outcomes, increased satisfaction among jobseekers and employers, and reduced waste, as well as ways to prevent issues from arising in future monitoring.

Monitoring is not primarily used to determine individual sub-recipient deficiencies, but also to determine systemic deficiencies within the public workforce system. When monitoring is treated as part of a continuous improvement cycle, it becomes less of an isolated “I got you” activity. Rather, it becomes part of people’s daily work activities and drives state and local staff members to identify what is and is not working well so as to ensure positive outcomes for customers and the system and to ensure a return on the federal investment.

Sharing and Disseminating Promising Practices

Using your monitoring activities to identify sub-recipients with promising practices is also a valuable endeavor as long as you find opportunities to disseminate and share the information with other sub-recipients in need. Some states have established state/local workgroups who collect information about promising practices and share the information through newsletters, conferences, and agency meetings. Appendices I and J contain some links for case management and state/local monitoring tools.

If you are in need of ideas, strategies, and lessons learned from programs that have already been tried and implemented by workforce system colleagues and evaluated by a third party, you can use a new web-based application called Workforce Systems Strategies (WSS). WSS is a new resource for workforce state and local program staff to identify and implement effective practices based on existing research, and ultimately to support improved outcomes for workforce system customers. The site highlights workforce strategies that are backed by a wide range of evidence, such as experimental studies, implementation evaluations, and performance data.

Each resource is summarized in a profile that gives basic information such as why the study or implementation tool might be useful; which populations, regions, or programs it focuses on; and major findings or recommendations to help site users decide whether to explore the complete document. Practices found on the site can be identified by

keyword, topic, target population, methodology, geographic region, or program affiliation, making this a quick and easy resource to use. We highly recommend that you and your state agencies use this website to identify strategies that work and ways to implement changes in your own workforce system. To access the site, please visit <http://strategies.workforce3one.org>.



Looking for Evidence-Based Research and Practices? Find It Here!

Workforce System Strategies is a website highlighting a wide range of research and implementation tools.

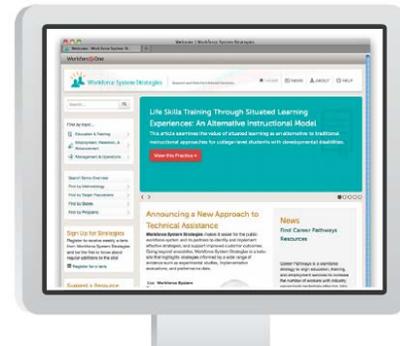
Use Workforce System Strategies to:

- Help your job-seeker and employer customers achieve better outcomes
- Identify evidence that may be useful in program design initiatives
- Be at the forefront of the workforce system!

Find it all on Workforce System Strategies:

<http://strategies.workforce3one.org>

A new technical assistance resource from the U.S. Department of Labor, Employment and Training Administration



This web-based application is especially important for state monitoring staff, like yourself, and technical assistance providers because it supplies you with valuable evidence-based information that can be used to assist sub-recipients in improving program operations and services. We highly recommend that you log onto the site, review its functionality, and register to receive updates from the system on new tools and resources that are added by ETA. We also encourage states to submit their own materials and research for inclusion on the site.



STATE HIGHLIGHTS

State Highlight: *New Hampshire*

New Hampshire's emphasis on providing technical assistance and training to sub-contractors helps the state to develop positive working relationships with local AJC staff. Each year the State of New Hampshire hosts an annual conference called the "NH Works Conference." This conference provides state staff with an opportunity to deliver technical assistance and training to contract staff and to increase the capacity of staff within the system to operate workforce programs. You may want to consider setting aside a dedicated time and space for local program operators to come together to hear about state priorities and policies, receive program training, and share innovative strategies for addressing workforce issues.

State Highlight: *New Jersey*

New Jersey's emphasis on promising practices has two important benefits: it puts a positive spin on the monitoring process, and it facilitates the dissemination of best practices throughout the state. At the conclusion of its onsite monitoring review, New Jersey monitors prepare a Monitoring Summary for each local area visited. This Monitoring Summary highlights the local area's promising practices, and these summaries are shared with all of the local areas in the state. The state also highlights these promising practices in its annual report to USDOL.

State Highlight: *Ohio*

Ohio's attention on tracking monitoring findings and concerns for each program year by sub-recipient ensures that the state can develop policies and procedures to address compliance issues and offer technical assistance, as needed. The State of Ohio keeps track of all findings and concerns each program year, and state monitoring staff work to identify whether there is a need for policy guidance or whether state-level training or peer-to-peer assistance from another sub-recipient would help to resolve the issues. If there is a recognized need for policy guidance, the Ohio monitoring unit will work with the state's policy unit to identify the issue and ways they can be addressed through guidance. This approach allows sub-recipients in Ohio understand that there are opportunities to share information and influence change during the monitoring process, which helps the monitoring process to be more collegial. The State of Ohio also has a state web-site that contains valuable information about innovative practices, which is available at <http://jfs.ohio.gov/owd/WorkforceProf/Innovative-Practices.stm>.

Key Questions: Technical Assistance and Promising Practices

- Does the state have a process to review monitoring reports to identify cross-cutting technical assistance needs? Does the state have a plan to address these needs?
- Does the state have a process for reviewing monitoring reports to identify emerging strategies?
- Does the state use its monitoring activities to provide technical assistance and training (e.g., policy development, web-based training, onsite training, peer-to-peer assistance)?
- Does the state share promising practices with sub-recipients across the state?

APPENDICES

APPENDIX A

Key WIA Statutory References Pertaining to Oversight and Monitoring

WORKFORCE INVESTMENT ACT OF 1998

WIA SECTION 111

(d) FUNCTIONS. —The State Board shall assist the Governor in— (2) development and continuous improvement of a statewide system of activities that are funded under this subtitle or carrier out through a one-stop delivery system described in section 134(c) that receives funds under this subtitle (referred to in this title as a “statewide workforce investment system”)

WIA SECTION 112

(b) CONTENTS. —The State Plan shall include—

(B) a description of the common data collection and reporting processes used for the programs and activities described in subparagraph (A);

(11) assurances that the State will provide, in accordance with section 184 for fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made under sections 127 and 132;

WIA SECTION 117

(d) FUNCTIONS OF LOCAL BOARD. —The functions of the local board shall include the following

(4) PROGRAM OVERSIGHT. —The local board, in partnership with the chief local elected official, shall conduct oversight with respect to local programs of youth activities authorized under section 129, local employment and training activities under section 134, and the one-stop delivery system in the local area.

WIA SECTION 136. PERFORMANCE ACCOUNTABILITY SYSTEM

(e) EVALUATION OF STATE PROGRAMS.—

(1) IN GENERAL.—Using funds made available under this subtitle, the State, in coordination with local boards in the State, shall conduct ongoing evaluation studies of workforce investment activities carried out in the State under this subtitle in order to promote, establish, implement, and utilize methods for continuously improving the activities in order to achieve high-level performance within, and high-level outcomes from, the statewide workforce investment system. To the maximum extent practicable, the State shall coordinate the evaluations with the evaluations provided by the Secretary under section 172.

(f) FISCAL AND MANAGEMENT ACCOUNTABILITY INFORMATION SYSTEMS (1) IN GENERAL.—Using funds made available under this subtitle, the Governor, in coordination with local boards and chief elected officials in the State, shall establish and operate a fiscal and management accountability information system based on guidelines established by the Secretary after consultation with the Governors, local elected officials, and one-stop partners. Such guidelines shall promote efficient collection and use of fiscal and management information for reporting and monitoring the use of funds made available under this subtitle and for preparing the annual report described in subsection (d).

WIA SECTION 183 MONITORING

(a) **IN GENERAL.**—The Secretary is authorized to monitor all recipients of financial assistance under this title to determine whether the recipients are complying with the provisions of this title, including the regulations issued under this title.

(b) **INVESTIGATIONS.**—The Secretary may investigate any matter the Secretary determines to be necessary to determine the compliance of the recipients with this title, including the regulations issued under this title. The investigations authorized by this subsection may include examining records (including making certified copies of the records), questioning employees, and entering any premises or onto any site in which any part of a program or activity of such a recipient is conducted or in which any of the records of the recipient are kept.

(c) **ADDITIONAL REQUIREMENT.**—For the purpose of any investigation or hearing conducted under this title by the Secretary, the provisions of section 9 of the Federal Trade Commission Act (15 U.S.C. 49) (relating to the attendance of witnesses and the production of documents) apply to the Secretary, in the same manner and to the same extent as the provisions apply to the Federal Trade Commission.

WIA SECTION 184 FISCAL CONTROLS; SANCTIONS

(a) **ESTABLISHMENT OF FISCAL CONTROLS BY STATES.**—

(1) **IN GENERAL.**—Each State shall establish such fiscal control and fund accounting procedures as may be necessary to assure the proper disbursement of, and accounting for, Federal funds allocated to local areas under subtitle B. Such procedures shall ensure that all financial transactions carried out under subtitle B are conducted and records maintained in accordance with generally accepted accounting principles applicable in each State.

(2) **COST PRINCIPLES.**—

(A) **IN GENERAL.**—Each State (including the Governor of the State), local area (including the chief local elected official for the area), and provider receiving funds under this title shall comply with the applicable uniform cost principles included in the appropriate circulars of the Office of Management and Budget for the type of entity receiving the funds.

(B) **EXCEPTION.**—The funds made available to a State for administration of statewide workforce investment activities in accordance with sections 134(a)(3)(B) shall be allocable to the overall administration of workforce investment activities, but need not be specifically allocable to—

(i) the administration of adult employment and training activities;

(ii) the administration of dislocated worker employment and training activities; or

(iii) the administration of youth activities.

(3) UNIFORM ADMINISTRATIVE REQUIREMENTS.—

(A) IN GENERAL.—Each State (including the Governor of the State), local area (including the chief local elected official for the area), and provider receiving funds under this title shall comply with appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving the funds, as promulgated in circulars or rules of the Office of Management and Budget.

(B) ADDITIONAL REQUIREMENT.—Procurement transactions under this title between local boards and units of State or local governments shall be conducted only on a cost-reimbursement basis.

(4) MONITORING.—Each Governor of a State shall conduct on an annual basis onsite monitoring of each local area within the State to ensure compliance with the uniform administrative requirements referred to in paragraph (3).

(5) ACTION BY GOVERNOR.—If the Governor determines that a local area is not in compliance with the uniform administrative requirements referred to in paragraph (3), the Governor shall—

(A) require corrective action to secure prompt compliance; and

(B) impose the sanctions provided under subsection (b) in the event of failure to take the required corrective action.

(6) CERTIFICATION.—The Governor shall, every 2 years, certify to the Secretary that—

(A) the State has implemented the uniform administrative requirements referred to in paragraph (3);

(B) the State has monitored local areas to ensure compliance with the uniform administrative requirements as required under paragraph (4); and

(C) the State has taken appropriate action to ensure compliance pursuant to paragraph (5).

WIA SECTION 185 REPORTS; RECORDKEEPING; INVESTIGATIONS

(a) REPORTS.—

(1) IN GENERAL.—Recipients of funds under this title shall keep records that are sufficient to permit the preparation of reports required by this title and to permit the tracing of funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully.

(2) SUBMISSION TO THE SECRETARY.—Every such recipient shall maintain such records and submit such reports, in such form and containing such information, as the Secretary may require regarding the performance of programs and activities carried out under this title. Such records and reports shall be submitted to the Secretary but shall not be required to be submitted more than once each quarter unless specifically requested by Congress or a committee of Congress, in which case an estimate may be provided.

(3) MAINTENANCE OF STANDARDIZED RECORDS.— In order to allow for the preparation of the reports required under subsection (c), such recipients shall maintain standardized records for all individual

participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records.

(4) AVAILABILITY TO THE PUBLIC.—

(A) IN GENERAL.—Except as provided in subparagraph (B), records maintained by such recipients pursuant to this subsection shall be made available to the public upon request.

(B) EXCEPTION.—Subparagraph (A) shall not apply to--

(i) information, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy; and

(ii) trade secrets, or commercial or financial information, that is obtained from a person and privileged or confidential.

(C) FEES TO RECOVER COSTS.—Such recipients may charge fees sufficient to recover costs applicable to the processing of requests for records under subparagraph (A).

(b) INVESTIGATIONS OF USE OF FUNDS.—

(1) IN GENERAL.—

(A) SECRETARY.—In order to evaluate compliance with the provisions of this title, the Secretary shall conduct, in several States, in each fiscal year, investigations of the use of funds received by recipients under this title.

(B) COMPTROLLER GENERAL OF THE UNITED STATES.— In order to ensure compliance with the provisions of this title, the Comptroller General of the United States may conduct investigations of the use of funds received under this title by any recipient.

(2) PROHIBITION.—In conducting any investigation under this title, the Secretary or the Comptroller General of the United States may not request the compilation of any information that the recipient is not otherwise required to compile and that is not readily available to such recipient.

(3) AUDITS.—

(A) IN GENERAL.—In carrying out any audit under this title (other than any initial audit survey or any audit investigating possible criminal or fraudulent conduct), either directly or through grant or contract, the Secretary, the Inspector General of the Department of Labor, or the Comptroller General of the United States shall furnish to the State, recipient, or other entity to be audited, advance notification of the overall objectives and purposes of the audit, and any extensive recordkeeping or data requirements to be met, not later than 14 days (or as soon as practicable), prior to the commencement of the audit.

(B) NOTIFICATION REQUIREMENT.—If the scope, objectives, or purposes of the audit change substantially during the course of the audit, the entity being audited shall be notified of the change as soon as practicable.

(C) ADDITIONAL REQUIREMENT.—The reports on the results of such audits shall cite the law, regulation, policy, or other criteria applicable to any finding contained in the reports.

(D) **RULE OF CONSTRUCTION.**—Nothing contained in this title shall be construed so as to be inconsistent with the Inspector General Act of 1978 (5 U.S.C. App.) or government auditing standards issued by the Comptroller General of the United States.

(c) **ACCESSIBILITY OF REPORTS.**—Each State, each local board, and each recipient (other than a subrecipient, subgrantee, or contractor of a recipient) receiving funds under this title-

(1) shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary;

(2) shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188; and

(3) shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title.

(d) **INFORMATION TO BE INCLUDED IN REPORTS.**—

(1) **IN GENERAL.**—The reports required in subsection (c) shall include information regarding programs and activities carried out under this title pertaining to—

(A) the relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;

(B) the programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities;

(C) outcomes of the programs and activities for participants, including the occupations of participants, and placement for participants in nontraditional employment;

(D) specified costs of the programs and activities; and

(E) information necessary to prepare reports to comply with section 188.

(2) **ADDITIONAL REQUIREMENT.**—The Secretary shall ensure that all elements of the information required for the reports described in paragraph (1) are defined and reported uniformly.

(e) **QUARTERLY FINANCIAL REPORTS.**—

(1) **IN GENERAL.**—Each local board in the State shall submit quarterly financial reports to the Governor with respect to programs and activities carried out under this title. Such reports shall include information identifying all program and activity costs by cost category in accordance with generally accepted accounting principles and by year of the appropriation involved.

(2) **ADDITIONAL REQUIREMENT.**—Each State shall submit to the Secretary, on a quarterly basis, a summary of the reports submitted to the Governor pursuant to paragraph (1).

(f) MAINTENANCE OF ADDITIONAL RECORDS.— Each State and local board shall maintain records with respect to programs and activities carried out under this title that identify--

(1) any income or profits earned, including such income or profits earned by subrecipients; and

(2) any costs incurred (such as stand-in costs) that are otherwise allowable except for funding limitations.

(g) COST CATEGORIES.—In requiring entities to maintain records of costs by category under this title, the Secretary shall require only that the costs be categorized as administrative or programmatic costs.

APPENDIX B

Key WIA Regulatory References Pertaining to Oversight and Monitoring

20 CFR Part 652 et al. Workforce Investment Act Final Regulations, Dated August 11, 2000

20 CFR § 667.210 What administrative cost limits apply to Workforce Investment Act title I grants?

(a) Formula grants to States:

(1) As part of the 15 percent that a State may reserve for Statewide activities, the State may spend up to five percent (5%) of the amount allotted under sections 127(b)(1), 132(b)(1) and 132(b)(2) of the Act for the administrative costs of Statewide workforce investment activities.

(2) Local area expenditures for administrative purposes under WIA formula grants are limited to no more than ten percent (10%) of the amount allocated to the local area under sections 128(b) and 133(b) of the Act.

(3) Neither the five percent (5%) of the amount allotted that may be reserved for Statewide administrative costs nor the ten percent (10%) of the amount allotted that may be reserved for local administrative costs needs to be allocated back to the individual funding streams.

(b) Limits on administrative costs for programs operated under subtitle D of title I will be identified in the grant or contract award document.

(c) In a One-Stop environment, administrative costs borne by other sources of funds, such as the Wagner-Peyser Act, are not included in the administrative cost limit calculation. Each program's administrative activities area chargeable to its own grant and subject to its own administrative cost limitations.

20 CFR § 667.220 What Workforce Investment Act title I functions and activities constitute the costs of administration subject to the administrative cost limit?

(a) The costs of administration are the allocable portion of necessary and reasonable allowable costs of State and local workforce investment boards, direct recipients, including State grant recipients under subtitle B of title I and recipients of awards under subtitle D of title I, as well as local grant recipients, local grant subrecipients, local fiscal agents and one-stop operators that are associated with those specific functions identified in paragraph (b) of this section and which are not related to the direct provision of workforce investment services, including services to participants and employers. These costs can be both direct and indirect.

(b) The costs of administration are the costs associated with performing the following functions:

(1) Performing the following overall general administrative functions and coordination of those functions under WIA title I:

(i) Accounting, budgeting, financial and cash management functions;

- (ii) Procurement and purchasing functions;
- (iii) Property management functions;
- (iv) Personnel management functions;
- (v) Payroll functions;
- (vi) Coordinating the resolution of findings arising from audits, reviews, investigations, and incident reports;
- (vii) Audit functions;
- (viii) General legal services functions; and
- (ix) Developing systems and procedures, including information systems, required for these administrative functions;

(2) Performing oversight and monitoring responsibilities related to WIA administrative functions;

(3) Costs of goods and services required for administrative functions of the program, including goods and services such as rental and purchase of equipment, utilities, office supplies, postage, and rental and maintenance of office space;

(4) Travel costs incurred for official business in carrying out administrative activities or the overall management of the WIA system; and

(5) Costs of information systems related to the administrative functions (for example, personnel, procurement, purchasing, property management, accounting and payroll systems) including the purchase, systems development and operating costs of such systems.

(c)(1) Awards to subrecipients or vendors that are solely for the performance costs of staff who perform both administrative functions specified in paragraph (b) of this section and programmatic services or activities must be allocated as administrative or program costs to be benefitting cost objectives/categories based on documented distributions of actual time worked or other equitable cost allocation methods.

(2) Personnel and related non-personnel costs of staff who perform both administrative functions specified in paragraph (b) of this section and programmatic services or activities must be allocated as administrative or program costs to the benefitting cost objectives/categories based on documented distributions of actual time worked or other equitable cost allocation methods.

(3) Specific costs charged to an overhead or indirect cost pool that can be identified directly as a program cost are to be charged as a program cost. Documentation of such charges must be maintained.

(4) Except as provided at paragraph (c)(1), all costs incurred for functions and activities of subrecipients and vendors are program costs.

(5) Costs of the following information systems including the purchase, systems development and operating (e.g., data entry) costs are charged to the program category:

- (i) Tracking or monitoring of participant and performance information;
- (ii) Employment statistics information, including job listing information, job skills information, and demand occupation information;
- (iii) Performance and program cost information on eligible providers of training services, youth activities, and appropriate education activities;
- (iv) Local area performance information; and
- (v) Information relating to supportive services and unemployment insurance claims for program participants;

(6) Continuous improvement activities are charged to administration or program category based on the purpose or nature of the activity to be improved. Documentation of such charges must be maintained.

20 CFR § 667.400 Who is responsible for oversight and monitoring of WIA title I grants?

(a) The Secretary is authorized to monitor all recipients and subrecipients of all grants awarded and funds expended under WIA title I to determine compliance with the Act and the WIA regulations, and may investigate any matter deemed necessary to determine such compliance. Federal oversight will be conducted primarily at the recipient level.

(b) In each fiscal year, we will also conduct in-depth reviews in several States, including financial and performance audits, to assure that funds are spent in accordance with the Act. Priority for such in-depth reviews will be given to States not meeting annual adjusted levels of performance.

(c)(1) Each recipient and subrecipient must continuously monitor grant supported activities in accordance with the uniform administrative requirements at 29 CFR parts 95 and 97, as applicable, including the applicable cost principles indicated at 29 CFR 97.22(b) or 29 CFR 95.27, for all entities receiving WIA title I funds. For governmental units, the applicable requirements are at 29 CFR part 97. For non-profit organizations, the applicable requirements are at 29 CFR part 95.

(2) In the case of grants under WIA sections 127 and 132, the Governor must develop a State monitoring system that meets the requirements of § 667.410(b). The Governor must monitor Local Boards annually for compliance with applicable laws and regulations in accordance with the State monitoring system. Monitoring must include an annual review of each local area's compliance with the uniform administrative requirements.

20 CFR § 667.410 What are the oversight roles and responsibilities of recipients and subrecipients?

(a) *Roles and responsibilities for all recipients and subrecipients of funds under WIA title I in general.* Each recipient and subrecipient must conduct regular oversight and monitoring of its WIA activities and those of its subrecipients and contractors in order to:

(1) Determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and the regulations in this part;

(2) Determine whether or not there is compliance with other provisions of the Act and the WIA regulations and other applicable laws and regulations; and

(3) Provide technical assistance as necessary and appropriate.

(b) *State roles and responsibilities for grants under WIA sections 127 and 132.*

(1) The Governor is responsible for the development of the State monitoring system. The Governor must be able to demonstrate, through a monitoring plan or otherwise, that the State monitoring system meets the requirements of paragraph (b)(2) of this section.

(2) The State monitoring system must:

(i) Provide for annual on-site monitoring reviews of local areas' compliance with DOL uniform administrative requirements, as required by WIA section 184(a)(4);

(ii) Ensure that established policies to achieve program quality and outcomes meet the objectives of the Act and the WIA regulations, including policies relating to: the provision of services by One-Stop Centers; eligible providers of training services; and eligible providers of youth activities;

(iii) Enable the Governor to determine if subrecipients and contractors have demonstrated substantial compliance with WIA requirements; and

(iv) Enable the Governor to determine whether a local plan will be disapproved for failure to make acceptable progress in addressing deficiencies, as required in WIA section 118(d)(1).

(v) Enable the Governor to ensure compliance with the nondiscrimination and equal opportunity requirements of WIA section 188 and 29 CFR part 37. Requirements for these aspects of the monitoring system are set forth in 29 CFR 37.54(d)(2)(ii).

(3) The State must conduct an annual on-site monitoring review of each local area's compliance with DOL uniform administrative requirements, including the appropriate administrative requirements for subrecipients and the applicable cost principles indicated at §667.200 for all entities receiving WIA title I funds.

(4) The Governor must require that prompt corrective action be taken if any substantial violation of standards identified in paragraphs (b) (2) or (3) of this section is found. (WIA sec. 184(a)(5).)

(5) The Governor must impose the sanctions provided in WIA section 184 (b) and (c) in the event of a subrecipient's failure to take required corrective action required under paragraph (b)(4) of this section.

(6) The Governor may issue additional requirements and instructions to subrecipients on monitoring activities.

(7) The Governor must certify to the Secretary every two years that:

(i) The State has implemented uniform administrative requirements;

(ii) The State has monitored local areas to ensure compliance with uniform administrative requirements; and

(iii) The State has taken appropriate corrective action to secure such compliance. (WIA sec. 184(a)(6)(A), (B), and (C).)

Subpart E—Resolution of Findings from Monitoring and Oversight Reviews

20 CFR § 667.500 What procedures apply to the resolution of findings arising from audits, investigations, monitoring, and oversight reviews?

(a) Resolution of subrecipient-level findings.

(1) The Governor is responsible for resolving findings that arise from the State’s monitoring reviews, investigations, and audits (including OMB Circular A–133 audits) of subrecipients.

(2) A State must utilize the audit resolution, debt collection, and appeal procedures that it uses for other Federal grant programs.

(3) If a State does not have such procedures, it must prescribe standards and procedures to be used for this grant program.

(b) Resolution of State and other direct recipient level findings.

(1) The Secretary is responsible for resolving findings that arise from Federal audits monitoring reviews, investigations, incident reports, and recipient level OMB Circular A–133 audits.

(2) The Secretary uses the DOL audit resolution process, consistent with the Single Audit Act of 1996 and OMB Circular A–133, and Grant Officer Resolution provisions of § 667.510, as appropriate.

(3) A final determination issued by a Grant Officer under this process may be appealed to the DOL Office of Administrative Law Judges under the procedures at § 667.800.

(c) Resolution of nondiscrimination findings. Findings arising from investigations or reviews conducted under nondiscrimination laws will be resolved in accordance with WIA section 188 and the Department of Labor nondiscrimination regulations implementing WIA section 188, codified at 29 CFR part 37.

20 CFR § 667.505 How do we resolve investigative and monitoring findings?

(a) As a result of an investigation, onsite visit, or other monitoring, we notify the recipient of the findings of the investigation and give the recipient a period of time (not more than 60 days) to comment and to take appropriate corrective actions.

(b) The Grant Officer reviews the complete file of the investigation or monitoring report and the recipient’s actions under paragraph (a) of this section. The Grant Officer’s review takes into account the sanction provisions of WIA section 184(b) and (c). If the Grant Officer agrees with the recipient’s handling of the situation, the Grant Officer so notifies the recipient. This notification constitutes final agency action.

(c) If the Grant Officer disagrees with the recipient’s handling of the matter, the Grant Officer proceeds under § 667.510.

20 CFR § 667.510 What is the Grant Officer resolution process?

(a) *General.* When the Grant Officer is dissatisfied with the State's disposition of an audit or other resolution of violations (including those arising out of incident reports or compliance reviews), or with the recipient's response to findings resulting from investigations or monitoring report, the initial and final determination process, set forth in this section, is used to resolve the matter.

(b) *Initial determination.* The Grant Officer makes an initial determination on the findings for both those matters where there is agreement and those where there is disagreement with the recipient's resolution, including the allowability of questioned costs or activities. This initial determination is based upon the requirements of the Act and regulations, and the terms and conditions of the grants, contracts, or other agreements under the Act.

(c) *Informal resolution.* Except in an emergency situation, when the Secretary invokes the authority described in WIA section 184(e), the Grant Officer may not revoke a recipient's grant in whole or in part, nor institute corrective actions or sanctions, without first providing the recipient with an opportunity to present documentation or arguments to resolve informally those matters in controversy contained in the initial determination. The initial determination must provide for an informal resolution period of at least 60 days from issuance of the initial determination. If the matters are resolved informally, the Grant Officer must issue a final determination under paragraph (d) of this section which notifies the parties in writing of the nature of the resolution and may close the file.

(d) *Grant Officer's final determination.* (1) If the matter is not fully resolved informally, the Grant Officer provides each party with a written final determination by certified mail, return receipt requested. For audits of recipient-level entities and other recipients which receive WIA funds directly from DOL, ordinarily, the final determination is issued not later than 180 days from the date that the Office of Inspector General (OIG) issues the final approved audit report to the Employment and Training Administration. For audits of subrecipients conducted by the OIG, ordinarily the final determination is issued not later than 360 days from the date the OIG issues the final approved audit report to ETA.

(2) A final determination under this paragraph (d) must:

- (i) Indicate whether efforts to informally resolve matters contained in the initial determination have been unsuccessful;
- (ii) List those matters upon which the parties continue to disagree;
- (iii) List any modifications to the factual findings and conclusions set forth in the initial determination and the rationale for such modifications;
- (iv) Establish a debt, if appropriate;
- (v) Require corrective action, when needed;
- (vi) Determine liability, method of restitution of funds, and sanctions; and
- (vii) Offer an opportunity for a hearing in accordance with § 667.800 of this part.

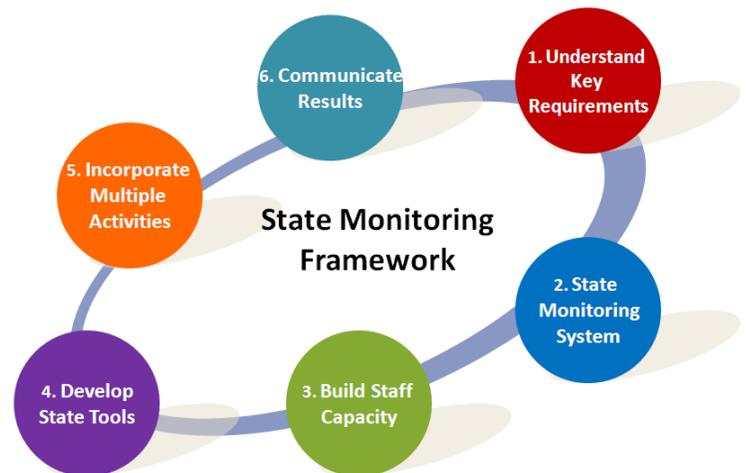
(3) Unless a hearing is requested, a final determination under this paragraph (d) is final agency action and is not subject to further review.

(e) Nothing in this subpart precludes the Grant Officer from issuing an initial determination and/or final determination directly to a subrecipient, in accordance with section 184(d)(3) of the Act. In such a case, the Grant Officer will inform the recipient of this action.

APPENDIX C

Readiness Assessment Tool for Effective Program Monitoring

The *Effective Program Monitoring Readiness Assessment Tool* was developed to assist state staff in forming and implementing their oversight and monitoring strategies at the state and local levels. This tool will help staff assess their state's oversight and monitoring strategies by looking at progress, priorities, gaps, and next steps. The tool is divided into the six key elements of developing an effective oversight and monitoring framework that will inform the state's monitoring system. These elements are: (1) Understand Key Requirements, (2) Develop an Integrated Framework for State Monitoring System, (3) Build Staff Capacity, (4) Develop Customized State Monitoring Tools, (5) Incorporate Different Types of Monitoring Activities, and (6) Communicate Results.



Using This Tool

The assessment tool is organized under the six key elements and includes corresponding indicators that are components of each element. Working in a team, examine the indicators to determine your state's progress on each key element. A four-point scale representing the phases of ongoing development will help you determine where your state is on achieving each key element. For each indicator, identify the place on the scale that best reflects your current effort and circle the number.

The four-point scale to assess progress is based on the following definitions:

1. **Initiation Phase:** The team has discussed this indicator but has not started planning.
2. **Planning Phase:** The team is engaged in a planning process to agree upon the steps necessary to move forward.
3. **Implementation Phase:** The team has completed planning and is in the process of implementing strategies.
4. **Enhance Phase:** Strategies have been fully implemented. Your state monitoring staff is managing for enhancement of this indicator.

The priority for action on any indicator can be ranked as high, medium, or low by circling A, B, or C (respectively) in the far right column.

Process Instructions

The following instructions will guide you through the process of using the assessment. We recommend that you complete this assessment during an in-person meeting, involving as many state monitoring staff as possible. Your team should identify a facilitator to guide the process as well as someone to record issues and ideas that come up through discussion.

You may adapt the process to do it via webinar or have individuals complete the assessment alone and submit to one person for synthesis.

Materials

- Printed 8 ½ X 11 copies of the assessment for each team member.
- One printed 24 X 36 black and white oversized copy of the assessment for the group (FedEx Kinko's can print these).
- Markers and tape.

Facilitator Instructions

1. Have each team member individually complete the phases of development section of the self-assessment. For each indicator, team members will rate the progress for each indicator using the four-point scale described above.

1 = Initiation Phase; 2 = Planning Phase; 3 = Implementation Phase; 4 = Sustain/Enhance Phase
2. Using the oversized version of the chart on the wall, have each team member make a "dot" next to their responses.
3. Discuss the group's responses, especially where there are wide differences of opinion on progress. Then, have a discussion about whether any *additional* indicators of progress should be included.
4. Next, each team member will complete the priority section of the self-assessment in the context of a discreet time frame (e.g., the next 6 months). It is helpful to limit the number of high priority activities and to force a few lows in each section.
5. Again, ask all team members to mark their responses on the wall chart and discuss. Identify priority actions for inclusion in your next steps plan.
6. Finally, evaluate your team's overall progress towards achieving the key elements, and discuss some goals and/or next steps for making greater progress. The items flagged as "A" under the Priority for Action column will help you to identify areas for action/improvement

<p><i>Please indicate the phase of implementation of your state for each of the key components listed. Also, indicate the level of priority for each action.</i></p>	Initiation Phase	Planning Phase	Implementation Phase	Sustain/Enhance Phase	Priority for Action
1. Understand Key Monitoring Requirements					
1. State staff responsible for monitoring has read the federal statute, regulations, policies and procedures, and applicable OMB circulars.	1	2	3	4	A B C
2. State staff engages in dialogues with local sub-recipients about the importance of oversight and monitoring.	1	2	3	4	A B C
3. State staff engages in dialogues with ETA Regional Office about how to improve the state’s oversight and activities.	1	2	3	4	A B C
2. Develop an Integrated Framework for the State Monitoring System					
1. Comprehensive state oversight and monitoring framework in place that addresses the following: <input type="checkbox"/> What units/staff are responsible for oversight and monitoring.	1	2	3	4	A B C
<input type="checkbox"/> Role and responsibilities of state units/staff are clearly defined.	1	2	3	4	A B C
<input type="checkbox"/> What activities are undertaken monthly, quarterly, and annually to oversee and monitor programs (e.g., risk assessments, desk reviews, data validation, site visits).	1	2	3	4	A B C
<input type="checkbox"/> Process in place to identify training and technical assistance needs.	1	2	3	4	A B C
<input type="checkbox"/> Process in place to identify promising practices.	1	2	3	4	A B C
<input type="checkbox"/> Opportunities to address technical assistance needs are incorporated into the design.	1	2	3	4	A B C
<input type="checkbox"/> Opportunities for sharing promising practices are widely utilized (e.g., written documents, training sessions, conference calls, administrator meetings).	1	2	3	4	A B C

<p><i>Please indicate the phase of implementation of your state for each of the key components listed. Also, indicate the level of priority for each action.</i></p>	Initiation Phase	Planning Phase	Implementation Phase	Sustain/Enhance Phase	Priority for Action
2. State departments (e.g., program, fiscal, and MIS) have been informed about the state’s monitoring framework and understand how the work they perform contributes to the state’s monitoring plan.	1	2	3	4	A B C
3. Key agency partners have met and provided feedback on what the state’s monitoring framework will include, as applicable:					
<input type="checkbox"/> Workforce Investment Board	1	2	3	4	A B C
<input type="checkbox"/> Data analysis or Management Information System	1	2	3	4	A B C
<input type="checkbox"/> Policy Development	1	2	3	4	A B C
<input type="checkbox"/> Administrative and Financial Services	1	2	3	4	A B C
<input type="checkbox"/> Audit Resolution/Monitoring	1	2	3	4	A B C
4. Senior leaders are aware of and have pledged support for the state’s monitoring framework (i.e., what monitoring activities will occur, which staff will be responsible, how results are communicated, etc.).	1	2	3	4	A B C
5. Resources are identified and dedicated to achieving the state’s monitoring framework.	1	2	3	4	A B C
3. Build Staff-Capacity					
1. Monitors understand how the work they perform contributes to successful implementation of the state’s monitoring framework.	1	2	3	4	A B C
2. Monitors are trained to conduct monitoring activities.	1	2	3	4	A B C
3. Monitors are familiar with federal and state policies and procedures (e.g., statute, regulations, OMB circulars, policies).	1	2	3	4	A B C
4. Monitors have an opportunity to participate in peer-to-peer sharing with other monitors.	1	2	3	4	A B C
5. Opportunities to improve knowledge and ability of sub-recipient monitors to oversee local activities are identified, and someone is responsible for development and implementation.	1	2	3	4	A B C

<p><i>Please indicate the phase of implementation of your state for each of the key components listed. Also, indicate the level of priority for each action.</i></p>	Initiation Phase	Planning Phase	Implementation Phase	Sustain/Enhance Phase	Priority for Action
<p>4. Create Customized Monitoring Tools</p>					
<p>1. Monitors have tools that can be used to conduct desk reviews and onsite visits, including:</p> <p><input type="checkbox"/> Fiscal Desk Review Tool</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Program Desk Review Tool</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Onsite Monitoring Letter and Schedule</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Onsite Monitoring Preparation Checklist</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Onsite Monitoring Program Guide (Adult, Dislocated Worker, and Youth)</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Participant Case File Review Tool</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Jobseeker and Employer Interview Protocols</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Case Management and Intake Observation Protocols</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Monitoring Report Format</p>	1	2	3	4	A B C
<p><input type="checkbox"/> Corrective Action Plan Format</p>					
<p>2. Monitors have tools that are customized to the strategic vision of the state’s public workforce system that incorporate citations for federal and state laws, regulations, policies, and procedures.</p>	1	2	3	4	A B C
<p>3. Monitoring tools include compliance and quality-service delivery and program elements:</p> <p>Governance <i>Examples include:</i></p> <p><input type="checkbox"/> The workforce board is actively engaged in establishing a vision for the public workforce system.</p>	1	2	3	4	A B C

<p><i>Please indicate the phase of implementation of your state for each of the key components listed. Also, indicate the level of priority for each action.</i></p>	Initiation Phase	Planning Phase	Implementation Phase	Sustain/Enhance Phase	Priority for Action
<input type="checkbox"/> New workforce board members are trained and understand their roles and responsibilities.	1	2	3	4	A B C
<input type="checkbox"/> American Job Centers' staffs are cross-trained on AJC partner programs.	1	2	3	4	A B C
<p>Industry Sector and Engage Employers <i>Examples include:</i></p> <input type="checkbox"/> Current and projected labor demand and supply have been assessed and are used to guide service delivery and planning.	1	2	3	4	A B C
<input type="checkbox"/> Education and skill needs of employers have been analyzed and gaps identified.	1	2	3	4	A B C
<input type="checkbox"/> Outreach plan for involving and addressing needs of business community has been developed and implemented.	1	2	3	4	A B C
<input type="checkbox"/> Employers representing targeted industries have been solicited for input for how workforce programs and AJC programs can meet their employment needs.	1	2	3	4	A B C
<p>Program Design <i>Examples include:</i></p> <input type="checkbox"/> A strong referral process is in place, which includes documentation of referrals.	1	2	3	4	A B C
<input type="checkbox"/> Assessments are used to help customers make informed decisions about their employment and training options.	1	2	3	4	A B C
<input type="checkbox"/> Individual career plans provide a clear direction for participants' education and training needs.	1	2	3	4	A B C
<input type="checkbox"/> Programs and services are non-duplicative and well-integrated in the American Job Centers' system.	1	2	3	4	A B C
<input type="checkbox"/> Training is accessible and maximizes customer choice.	1	2	3	4	A B C

<p><i>Please indicate the phase of implementation of your state for each of the key components listed. Also, indicate the level of priority for each action.</i></p>	Initiation Phase	Planning Phase	Implementation Phase	Sustain/Enhance Phase	Priority for Action
<input type="checkbox"/> Wrap around support services are available, including job placement service, career and financial counseling.	1	2	3	4	A B C
<input type="checkbox"/> Follow-up services are provided and documented for 12 months following exit from the program.	1	2	3	4	A B C
<p>Performance Accountability <i>Examples include:</i></p> <input type="checkbox"/> Managers and line staff have access to information about performance.	1	2	3	4	A B C
<input type="checkbox"/> Management reports are used to help inform decisions about service design and delivery.	1	2	3	4	A B C
<p>4. Process in place to review, update and modify monitoring tools.</p>	1	2	3	4	A B C
<p>5. Process for updating and modifying tools includes input from state fiscal, program and MIS units.</p>	1	2	3	4	A B C
<p>6. State monitoring tools include open-ended questions for respondents from multiple levels (e.g., administrative entity, AJC operator, and line staff).</p>	1	2	3	4	A B C
<p>7. State monitoring tools include opportunities for state monitoring staff to observe service interventions and talk with customers (e.g., jobseekers and employers).</p>	1	2	3	4	A B C
<p>5. Incorporate Different Types of Monitoring Activities</p>					
<p>1. Key factors that place a sub-recipient at risk of not meeting statutory or regulatory requirements have been identified.</p>	1	2	3	4	A B C
<p>2. Combination of desk reviews and onsite visits used to monitor sub-recipients.</p>	1	2	3	4	A B C

<i>Please indicate the phase of implementation of your state for each of the key components listed. Also, indicate the level of priority for each action.</i>	Initiation Phase	Planning Phase	Implementation Phase	Sustain/Enhance Phase	Priority for Action
3. Monitoring activities incorporate a review of strategic, operational and performance elements.	1	2	3	4	A B C
4. Opportunities to identify and address technical assistance needs are built into the monitoring process.	1	2	3	4	A B C
5. Opportunities to identify and share promising practices are built into the monitoring process.	1	2	3	4	A B C
6. Communicate Results					
1. There is a process in place to communicate results of monitoring activities in writing in a timely fashion (i.e., less than 30 days from onsite monitoring visit).	1	2	3	4	A B C
2. State has developed a process that sub-recipients use to address compliance issues (i.e., corrective action plan).	1	2	3	4	A B C
3. There is a follow-up plan that monitors use to track and ensure that corrective action has occurred, and this is done in a timely manner (i.e., corrective action occurs in less than 60 days from the date of the official monitoring report).	1	2	3	4	A B C
4. State has defined a process to track and address technical assistance and training needs of sub-recipients.	1	2	3	4	A B C
5. State has defined a process/tool to track and share promising practices with sub-recipients.	1	2	3	4	A B C

APPENDIX D

Customer Interview Guide

Use the protocol below to ask customers who are seeking employment questions about their experiences in the local American Service Center.

Introduction

- Introduce yourself and your organization.
- Ask the customer to introduce her/himself.
- Thank the customer for taking the time to speak with you.
- Ask the customer if s/he understands the purpose of today's interview. If not, explain that you are reviewing the services and programs offered at the center (*Insert special name for American Job Center, if available*) and want to gain a better understanding of how programs and services are delivered.
- Inform the customer that the information they share will be confidential (e.g., *What you say will be kept confidential. We will not use your name in our report or communication with the center*).

Questions

- What are your employment goals?
 - Are you currently working? If not, how long have you been out of work?
- Why did you decide to come to [*insert name of American Job Center*]?
 - Before coming to the center, what are some of the things you did to look for work? How did they work out?
- How long have you been coming to [*insert name of American Job Center*]?
- Have you used the center's resource room? If so,
 - How many times? Over what period of time?
 - What did you do in the resource room?
 - Did you get any help from resource room staff?
 - What did they help you with?
 - How helpful were they?

- Overall, how useful did you find the resource room? Is there anything you think should be changed/improved about the resource room services or process to access services in the resource room?
- Have you attended any workshops? Which ones? [You may know this from the participant case file review.]
 - How helpful were these workshops? Explain?
 - How did you hear about these workshops? Were you required to do anything either before or after the workshops?
 - How helpful was this workshop? What did you like best? Least?
 - Have you taken other workshops? If yes, which ones? [You may know this from the participant case file review.]
 - How helpful were these other workshops? Why?
 - Were the other workshops similar to the one you attended today? If not, explain how they differed.
- Have you had an opportunity to meet one-on-one with a center staff person? How often have you met with a staff person?
 - Have you always met with the same person? If not, who else have you met with?
 - Were these all one-on-one meetings? If not, who else attended the meetings?
- What did you do during these meetings? About how much time did you spend on each of these activities?
 - Fill out paperwork?
 - Talk about your career goals?
 - Discuss your job search or how to improve your resume? Describe.
 - Discuss available jobs you could apply for?
 - If so, did a staff person give you the name and contact info for an employer? Did the staff call the employer for you?
 - Review your skills, interests, and goals with a specific test or set of tests?
 - If so, what did you learn from the test(s)? What effect did your score(s) have on the services you have or will receive or your career goals?

- Discuss participating in training? Describe:
 - Did you discuss whether training was the best way for you to reach your career goals? Which program or provider would be best?
 - How easy or challenging [was/is] the process of getting into WIA-funded training? How helpful has your counselor been in assisting you with the process?
- Did you develop an Individual Employment Plan during these meetings?
- Did you receive assistance with creating or revising your resume?
- What type of job search assistance did you receive from the AJC staff?
- Overall, how helpful have you found these meetings with center staff? What aspect has been most helpful? Least helpful?
- Did you get any help from the center with child care, transportation, tools, work clothes, etc.? Describe.
 - How important was this support in keeping you in training? Getting you a job?
- Did your counselor or someone else at the center refer you to other agencies for more help? If so:
 - Where were you referred? Why?
 - Was [name of referral organization] able to help you? Why/why not?
- Overall, how much has [insert name of American Job Center] helped you to make progress in achieving your career goals?
 - What service or activity has been most helpful so far? What has not been helpful?
 - Is there any service you need to achieve those goals that's not offered here?

At the close of the interview, make sure to thank the customer and wish him/her good luck with job search/training/etc.

APPENDIX E

Resource Room Customer Interview Guide

These informal customer interviews will be carried out during the state monitoring visit. You will need to identify and interview customers in the resource room who are willing to spend a few minutes to talk with you about their experiences with self-services.

In approaching them, you could say something like this: *“Hello. I’m doing a monitoring review of the local center on behalf of the state and am hoping to talk with people who’ve used the services available in the resource room. Would you have 10-15 minutes to talk with me about your experiences? This interview is confidential, so your name will never be used in my report.”*

Customer and Usage Patterns

- Is this your first time here or have you been here before?
- How many times?
- When you come, how long do you usually stay?
- Why have you come here? What are you hoping to accomplish by using these services (e.g., find a job)?

Marketing

- How did you learn about the services available at this center and in the resource room?

Intake and Orienting Customers to Services

- When you first came to the center, how did you learn what specific services are available and how to use them (e.g., Did you have an orientation? Did someone show you around? Are there self-help manuals and instructions available?)?
 - If received, how helpful was your orientation? Are there any aspects of it that could have been improved?
 - How helpful were any self-help manuals or instructions?

Tools and Resources

- Which electronic/computer-based services have you used in the center?
 - How helpful and easy to use have these services been?
 - Is there anything about these services you’d like to see improved?
- Were you familiar and comfortable with computers before coming to the [American Job Center]?

- If not, did the center assist you in learning how to use computers? How?
- How useful was this assistance? Can you now easily use computer-based tools and resources?
- Have you ever accessed any of these electronic services remotely via the Internet?
 - If so, how does your experience compare to using the services in the resource room?
- Describe each non-electronic service you have used in the center (e.g. job postings, catalogs on education and training providers, LMI, clipping files, job-search and career-planning books).
 - How helpful and easy to use have these services been?
 - Is there anything about these services you'd like to see improved?
 - What other resources have you used in the center (copy machine, printer, phone, etc.)?
- Have you ever had to sign up on a waiting list to use any services?
- How helpful have center staff been to you?
 - Are they always available to help? Has there ever been a time when they were not available?
 - What help have they given you?
 - How adequate or helpful was it?
 - Do you always have to go and ask for help, or do center staff sometimes come by and ask if you need help?

Persons with DisAbilities (If APPLICABLE)

- Have you ever used any of the special equipment available in the resource area (e.g. Zoomtext, large screen monitor)?
 - How well did they work?

Overall Assessment

- Overall, how helpful are the services available in the center?
- Are there any services that are not currently available that you would like to have access to?
- Do you have any suggestions for improvements?

At the close of the interview, make sure to thank the customer and wish him/her good luck with their job search/training/etc.

APPENDIX F

Resource Room Observation Guide

Observe the following areas of the resource room and write down what you observe in terms of resource room layout/materials, available equipment, and staff interactions with customers.

Layout and Materials

Relationship to customer volume (cramped, spacious, crowded, etc.). Describe.

Is the resource room comfortable (e.g., comfortable tables and chairs)? Is it a professional and inviting atmosphere (e.g., well decorated, neatly maintained, a place where you would want to go)?

Describe the library. Where is it located (is it accessible to anyone in the Resource Room)? Approximately how many books, videos, DVDs, etc. are available? What types? Do they seem new or old? Do customers appear to use these resources?

Is there a job announcement posting area? Describe it. Are customers using it? Are postings up-to-date?

What other hard copy materials are available in the resource room (e.g., flyers for social services, information on local training providers, LMI)?

Describe any center orientation tools that are provided.

What tools/materials are available on resource room computers (such as Mavis Beacon Typing Tutorial, Resume Builder, self-directed assessments), not including resources available to anyone on the Internet? List.

What supplies are available for customers (for example, pens, paper, etc.)?

Any other noteworthy design features (e.g., child care, play area, coffee, employer area)? Please describe.

Assess the overall adequacy of the layout to meet customers' needs.

Equipment

Please complete the following inventory of equipment in the resource room available for customers' use:

Available Equipment	Number	Additional information
Computers		
Printers		
Fax		
Telephones		
VCR or DVD Player		
Other (describe)		
Other (describe)		

Customer Use

How many customers are in the resource room at the *beginning* of the observation period? _____

How many customers are there at the *end* of the observation period? _____

About how many minutes do most customers stay in the resource room? Are most customers who were there at the beginning of the observation still there at the end?

Describe if/how customers are assisted as they enter the resource room.

Describe how customer usage of the resource room is tracked (e.g., they sign in when they enter, their membership cards are swiped). Is every customer tracked? Does the process match with what local program staff told you would happen? If different, describe how.

What services were customers using during the observation period? Which areas seemed to be most in-demand? Describe.

Did customers have to wait to use any equipment or resources? Was there a waiting list? Describe.

Staff Assistance

How many staff members are in the resource room during the observation period? _____

If known, how many of these staff are “resource room” staff or other staff, such as counselors. Please explain.

Are all of these staff in the resource room for the entire observation period? Y/N

If no, which staff leave and/or enter? _____

What are staff doing during the observation? Do they mostly sit or stand at the greeter desk, or do they walk around the room?

How do customers get help from staff (e.g., stand in line, raise hand, staff come around)?

During the observation, about how long, on average, do resource room staff spend working one-on-one with customers? How much does this vary?

What type of help are staff providing through this one-on-one assistance (technical help with computers or software, help with job searching, help with resume preparation, etc.)?

Does the amount of staff assistance in the resource room appear sufficient, or do customers seem to need more help than is readily available? Explain.

Notes

Please record anything else about the resource room that seems relevant to the study.

APPENDIX G

Case Management Session Observation Guide

Please use this form when you are observing a counseling/case management meeting. Make a copy of this form to use with each counseling/case management meeting observation you are carrying out.

Date: _____ Site Visitor: _____ LWIA: _____

American Job Center: _____

Customer first name: _____

Purpose of the Meeting

General career counseling/job search assistance (not specifically training-related). Specify:

Customer in process of applying for training funds. Specify.

Support/check-in for customer in training. Specify.

Placement assistance. Specify.

Follow-up service (for customer placed in employment). Specify.

Physical Setting for the Meeting (type of space, privacy, comfort, etc.):

Is the setting appropriate for the nature of the service (sufficient privacy, etc.)? Y/N

Why/why not?

Describe What Occurs During the Meeting.

As you do, keep in mind the following questions (these questions will be in the write-up):

Are any assessments discussed? Which ones? How are results presented/used?

Is there any discussion of an IEP? Is the discussion about creating or modifying?

Are referrals to other American Job Center partner or community programs made? To which programs? How much assistance is provided with the referral (e.g., is the customer simply given a name and address, OR does the counselor set up an appointment for the customer with the referral agency?)

Are supportive services discussed? Which types? Are funding amounts or limits discussed?

Are sources of funding for training (or other services) other than WIA discussed? If so, which ones? What is discussed?

If the session involves selecting a training program or provider, what guidance/advice does the counselor provide? To what degree is customer choice being honored? Are any agreements reached? What is the basis for those agreements (e.g., information provided by staff, other).

Is there any evidence that the customer wants to make a choice (e.g., enroll in activities, select a training occupation or course or any particular vendor) with which the counselor disagrees? Vice versa? Is the disagreement resolved? If so, how?

Assess the extent of the relationship between the customer and the counselor. How comfortable with each other do they seem? Does the customer appear to trust the counselor?

Does the customer appear satisfied with the meeting? Does the customer seem to need or want additional assistance that is not being provided?

Total length of the meeting? _____minutes

What next steps were suggested to occur after the meeting?

Quickly ask the staff person about anything in the session you didn't completely understand (e.g., unfamiliar acronyms, unclear procedures that were discussed).

APPENDIX H

Corrective Action Planning Tool

The *Corrective Action Planning Tool* was developed for states to use with their local sub-recipients. This tool provides a consistent format and structure for local sub-recipients to describe actions they will take to address monitoring findings and observations. This tool lays out all of the required pieces of information that should be contained in a corrective action plan. These key pieces of information include: (1) Core Component; (2) Priority Objective; (3) Tactics/Activities; (4) Lead; (5) Expected Outcomes; (6) Due Date; and (7) Progress & Adjustments.

Process Instructions

The following instructions will guide you through the process of using the Corrective Action Planning Tool to address monitoring findings and observations from your most recent monitoring visit conducted on *(insert date)*. We recommend that you work closely with the state monitoring staff/lead monitor to address the issues identified in the monitoring report and that you form a local team to address the findings and observations included in the state’s report. Your team should identify a facilitator to guide the process as well as someone to record issues and ideas that come up through your discussion(s).

Instructions

1. **List the core component or topic in the blue heading panel.** Note the overarching topic or issue, which comes directly from the state monitoring report, and the areas that need to be addressed in the corrective action plan (e.g., eligibility documentation, case note documentation). It is recommended that sub-recipients include a description of the finding from the state report as well as any statutory/regulatory citations or policy numbers that are referenced in the report.
2. **List priority objectives.** List the prioritized activities or indicators in the “Objectives” column. This should be a summary statement about how you plan to address the state’s findings and observations.
3. **Discuss tactics/activities.** Discuss and list the tactics or actions you will conduct to implement each strategy in the “Tactics/Activities” column. You should provide a clear description of all the activities that will be undertaken to remedy the findings and/or observations. Keep in mind that you may need to take multiple steps to remedy a finding or observation and it is important to lay out each activity.
4. **Determine who’s responsible.** Enter the name or initials of the person or persons (or organization) responsible in the “Lead” column. It is best to be as specific as possible in this section regarding which staff or unit will be responsible for implementing the activities to address the issue, so these staff can be held accountable for implementing the identified Tactics/Activities in Column 3.

5. **Discussed expected outcomes.** Enter the “Expected Outcomes” of the actions in the fourth column. This column should be used to address what the result will be of all the various activities you plan to implement (new local policy, training for American Job Center staff and partners, etc.).
6. **Determine due date.** Enter the timeline and/or “Due Date” for each activity in the fifth column.
7. **Assess and mark the progress and adjustments.** Assess and describe the stage of development for each priority objective and where you are in the process of remedying the finding/observation. You should be able to answer what has been accomplished in addressing the issue and provide evidence that the issue has been resolved. For example, if the state recommended a local policy be developed to address an issue, it is recommended that you submit a copy of the policy along with the completed Corrective Action Plan. This column can also be used to submit updates on your progress in implementing the activities to the state. It is recommended that once the item has been resolved that you check whether the issue is resolved/unresolved.

CORE COMPONENT: FINDING--

Priority Objectives <i>What we will do</i>	Tactics/Activities <i>How we will do it</i>	Lead <i>Who is responsible?</i>	Expected Outcomes <i>What is the result?</i>	Due Date	Progress & Adjustments <i>What have we accomplished?</i>
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved

CORE COMPONENT: FINDING--

Priority Objectives <i>What we will do</i>	Tactics/Activities <i>How we will do it</i>	Lead <i>Who is responsible?</i>	Expected Outcomes <i>What is the result?</i>	Due Date	Progress & Adjustments <i>What have we accomplished?</i>
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved
					<input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved

APPENDIX I

Selected Technical Assistance Resources on Case Management

The following resources may be of interest to anyone looking for further information on effective case management and increased workforce system integration. These resources are available on Workforce3One.org at <https://effectivecasemanagement.workforce3one.org>

Effective Case Management: Key Elements and Practices from the Field

Authors and Publication: *Elizabeth Laird and Pamela Holcomb (Mathematica Policy Research and Social Policy Research Associates, 2001).*

Summary: This issue-brief describes key elements and practices for effective case management in the workforce system. It includes examples of state and local tools, processes, and policies designed to create or improve case management, including an annotated list of additional resources.

https://effectivecasemanagement.workforce3one.org/page/resource_map

Effective Case Management Resource Map

Author and Publication: *Social Policy Research Associates (2011).*

Summary: This map illustrates the different components of effective case management and compiles the results of a survey of existing literature on effective case management in the workforce development system. It contains hyperlinks to reports, policy documents, webinars, and toolkits.

https://effectivecasemanagement.workforce3one.org/page/resource_map

Technical Assistance Supporting Effective Case Management Webinar

Author and Publication: *Social Policy Research Associates (2011).*

Summary: This recorded webinar, facilitated by SPR staff, originally aired May 25, 2011. It offers a framework for providing system support to case managers to ensure that they have the tools and skills they need to serve customers. It also shares resources, tools, and the first-hand experience of practitioners from the field.

<https://effectivecasemanagement.workforce3one.org/page/resources/1001117358476963476/>

Peer to Peer Discussion with Jeanne Block

Author and Publication: *Social Policy Research Associates (2011).*

Summary: This recorded webinar originally aired June 6, 2011, with guest practitioner Jeanne Block, Staff Development Services Supervisor in the Workforce Development Partnership of the Pennsylvania Department of Labor & Industry. Topics include technology and training, turnover, and Pennsylvania's case manager training course.

<https://effectivecasemanagement.workforce3one.org/page/resources/1001117358476963476/>

APPENDIX J

Selected Technical Assistance Resources on State Monitoring Tools

The following resources may be of interest to states and local areas interested in reviewing monitoring materials from other states and local areas. These tools are designed to ensure that WIA grant recipient policies, procedures, and operations meet the objectives of and comply with all applicable federal and state laws, regulations, and policies. They are provided to serve as examples from which states may choose to pull promising practices for their own monitoring tools, although they are not sanctioned as official guidance.

WIA Monitor Training

Department of Labor (DOL), Employment and Training Administration (ETA)

[http://wsd.dli.mt.gov/wia/_2013virtualconference/WIA%20Monitor%20Training%20Updated%20Apr%202013%20v2%20\(2\).pdf](http://wsd.dli.mt.gov/wia/_2013virtualconference/WIA%20Monitor%20Training%20Updated%20Apr%202013%20v2%20(2).pdf)

Core Monitoring Guide

Department of Labor (DOL), Employment and Training Administration (ETA)

<http://www.doleta.gov/regions/reg02/documents/OSID%20Conference/Resource%20-%20Core-Monitoring-Guide.pdf>

Local Workforce Investment Area's Program, Fiscal & Performance Monitoring Guide for Subrecipients

New York State, Department of Labor, Workforce Development and Training Division

<http://www.labor.ny.gov/workforcenypartners/emg/emgtoc.htm>

Monitoring Procedures Guide

Nebraska Department of Labor

http://dol.nebraska.gov/answers/wia/mon_manual.pdf

Monitoring Guide

Pocono Counties Workforce Investment Area

<http://www.pcwia.org/pcwiamonitoringguide.pdf>

Program On-Site Monitoring Guide

San Mateo County Workforce Investment Board

<http://www.peninsulaworks.org/documents/ProgramMonitoringGuide.pdf>

Workforce Investment Act Policy Manual

Georgia Governor's Office of Workforce Development

http://workforce.georgia.gov/sites/workforce.georgia.gov/files/related_files/site_page/GOWD-WIA%20Policy%20Manual%20PY2012.pdf

EFFECTIVE MONITORING SYSTEM GUIDE: Ten Key Steps

109

Developed on Behalf of the U.S. Department of Labor by Social Policy Research Associates