

Region 14 Monitoring Policy

The monitoring system for each program also ensures that at least ten percent (10%) of all participants who register or are enrolled during each quarter, and who are still active at the time of verification, receive a complete verification of eligibility as part of a quarterly monitoring process conducted by the WIOA A/DW/Youth Director. The verification must be completed by the end of the quarter following the quarter being sampled (e.g., the first quarter verification must be completed by the end of the second quarter). For this monitoring process, sampling procedures are in place for drawing a random sample of participants newly registered or enrolled in a particular quarter. These procedures ensure that the sampling is random and that the requirements of this subsection are met.

- 1) If verification is done at the time of registration, the sampling procedure must identify each registrant whose eligibility must be verified prior to or at the time the registration is entered into the Common Intake Case Management System;
- 2) If verification is done quarterly, the sample must be drawn within fifteen (15) days of the end of the quarter being sampled and verified;
- 3) A participant concurrently enrolled in more than one Title or program must be included in the universe for each program in which the participant is enrolled; and
- 4) A participant must be included in the sample only in the quarter the participant was enrolled.

Documentation is maintained for each participant selected for verification. The documentation must contain enough information in order for staff to review or make the eligibility determination. Documentation used to verify eligibility must coincide with the date of registration. At a minimum, documentation must include:

- 1) Documentary evidence (i.e., obtaining the document or a photocopy of the document); or
- 2) Collateral contacts for which the following information must be recorded:
 - a) Date of contact;
 - b) Name of person providing information;
 - c) Contact method;
 - d) Relationship of person contacted to applicant; and
 - e) Information received.

A verification report is not required if the verification sample program developed by the State Administrative Entity is used or if verification is completed on all participants. In all other cases, a verification report must be developed. That report must include:

- 1) The universe size;
- 2) The number of participants selected for verification;
- 3) The verification period; and, if applicable,
- 4) The names and termination dates of participants identified as ineligible and the reasons for ineligibility;
- 5) The number of participants whose eligibility was determined to be unverifiable and the reason(s); and
- 6) The ineligibility rate = (number of ineligibles x 100) / (sample size - number of unverifiable)

Once during each program year, the WIOA A/DW/Youth Service Provider must monitor each contract written for \$25,000 or more. The WIOA A/DW/Youth Service Provider must also monitor the following:

- 1) A random sample of 10 percent of all non-OJT financial contracts under \$25,000 which start during the quarter;
- 2) A random sample of 10 percent of non-financial activity of service contracts which start during the quarter; and
- 3) A random sample of 10 percent of all participant files of participants enrolled or transferred into adult, dislocated worker and youth programs during the quarter.

These random samples must be drawn quarterly and the monitoring activity for the quarter must be completed at the end of the subsequent quarter. In addition, all On-the-Job training contracts must be monitored during the second 30 day period of activity under the contract and at least every 90 days thereafter.

Procedures are in place in WDA14 to ensure the monitoring samples are random and all requirements are met.

Participant Files

- a) The monitoring sample must be drawn after the end of the quarter being sampled and monitored but no later than 30 days after the last day of the quarter being sampled
- b) A participant co-enrolled in more than one program must be included in the universe for each program in which the participant is enrolled;
- c) A participant must be included in the sample only in the quarter the participant is enrolled; and
- d) A participant who has been transferred must be included in the sample for the quarter during which the transfer occurred

Contracts

- a) The 10 percent monitoring sample of all non-OJT contracts below \$25,000 must be drawn after the end of the quarter being sampled and monitored but no later than 30 days after the quarter being sampled; and

- b) A contract must be included in the sample for the quarter within which its effective date falls.

Following are the compliance review requirements for completing the two basic types of monitoring, participant file and contract monitoring. The following requirements apply to all programs.

1) Participant File Monitoring must include a review of:

- a) The participant record including a review of the eligibility determination;
- b) A sample of direct payments to the participant;
- c) A sample of time and attendance records; and
- d) Compliance with federal and State regulations and the Local plan.

2) Contract Monitoring, including OJT contracts, must include a review of:

- a) The service provider record;
- b) A sample of fiscal transactions;
- c) Payroll and time and attendance records, as appropriate;
- d) Compliance with the federal and State regulations and the Local plan;
- e) Compliance with equal opportunity regulations;
- f) Compliance with Service Plan; and
- g) Compliance with the Work Statement, Training Outline and all other contract provisions contained in the Contract.

Monitoring Reports

The monitoring system includes documenting that the monitoring activity has taken place. In order to meet the documentation requirement, a monitoring report on each contract or participant monitored is prepared and maintained along with documentation of corrective action required and taken. Any

findings and corrective action to be taken is transmitted to the monitored entity in writing. If the monitoring results in no findings requiring corrective action, this information may be communicated at the exit interview or in writing.

If a co-enrolled participant is drawn in the sample for more than one program for the same quarter, only one monitoring report, which includes both monitoring activities, is completed.

Summary of Monitoring Reports

A summary report of monitoring activity is completed for all programs. These summary reports are maintained and available for Iowa Workforce Development use in its program compliance review process.

A summary report is completed for each program monitored for each quarter by the end of the subsequent quarter includes:

In place of the following lists, a computer generated list derived from the program provided by Iowa Workforce Development is used.

- 1) A list of all participants enrolled or transferred into a program during the quarter;
- 2) A list of all participants that were monitored during the quarter;
- 3) A list of all contracts for \$25,000 or more with effective dates that fall within the quarter;
- 4) A list of all OJT contracts that were active during the program year with effective dates;
- 5) A list of all non-OJT contracts (financial and non-financial) for less than \$25,000 with effective dates that fall within the quarter;
- 6) A list of all non-OJT contracts that were monitored during the quarter;

The WDB14 meets every other month beginning in January of each year.

Standing agenda items include: budget, performance, success of initiatives, WIOA law implementation updates, partner meeting updates, needs assessments, Middle Skills Gap updates, training provider changes/approvals, completed regional activities, success stories and other relevant information to the vision and goals for the region so they are informed and knowledgeable about the needs of the region as well as the performance to the goals.

Review/monitoring process for One-Stop system services will be implemented to provide feedback, technical assistance and information for continuous improvement initiatives.

Surveys and follow up are obtained from customers to provide feedback to staff, and/or request one-on-one follow up. Surveys are used to call customers who leave contact information to offer them assistance they have requested.

