

St. Charles Region Local Policy Cover Sheet

Policy Subject: Sub-State Monitoring
Based on OWD Issuance: 11-2021
Effective Date: September 24, 2021
Revision Date: October 08, 2021
Expiration Date: Continuous, until further notice
Does this require Local Plan Modification? Yes



SUB-STATE MONITORING POLICY

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DWD Issuance **11-2021** states that WIOA mandates administrative and program oversight responsibilities that, in partnership with the Chief Local Elected Official (CLEO), are inherent functions of the Local Workforce Development Board (LWDB). Other oversight responsibilities include: conducting quarterly programmatic, financial, and equal-opportunity monitoring, annual reviews of One-Stop Operators, and other technical corrections.

Responsible Representative and Accountability

The Executive Director of St. Charles County Department of Workforce & Business Development is responsible for oversight as the position is not funded by WIOA grants. This position is employed by County government and reports to the local elected official. However, this position is also accountable to the Workforce Development Board (WDB). The Local WDB and the CLEO, in partnership, are responsible for oversight of WIOA Title I programs. **Our local Compliance and EO Monitor will be the designated staff** to perform monitoring duties **as this position is not** connected to the monitored duties and systems **thus avoiding** any conflict of interest.

Though staff to the Executive Director may perform monitoring functions, it is the Executive Director that will submit an annual report each Program Year so the Local WDB and the CLEO can make appropriate judgements.

Compliance and Performance

The Local WDB and CLEO will receive annual monitoring reports regarding compliance with the terms and conditions of each contractual scope of work. The monitor will provide subcontractor and Local WDB area performance reviews to the WDB and CLEO on an annual basis.

Other areas monitored and reported are the adequacy of assessment, planning of activities and services, coordination with One Stop System partners to meet comprehensive needs of customers and outcomes. When problems are identified, prompt and appropriate corrective action will be taken.

Compatibility

The area's monitoring policies and procedures will mirror the State's monitoring policy and procedures of programmatic, administrative, and operational oversight to ensure an effective measure of compliance is compatible with WIOA regulations and Department of Higher Education and Workforce Development (DHEWD) policies.

Risk Assessments

Prior to issuing any award under WIOA Title I, the Local WDB will conduct a risk assessment to assess the Subrecipient's overall ability to administer Federal funds as required under 2 CFR 200.205. (See Attachment 1)

1. As part of this assessment, the Local WDB will consider any of the Subrecipient's history with regard to management of other grants, financial stability, quality of management systems and standards, history of performance, timeliness of compliance, conformance to terms and conditions of previous awards, reports and findings from audits, and ability to implement effectively statutory, regulatory, or other requirements.
2. Thereafter, the Local WDB will conduct annual subrecipient risk assessments based on criteria identified above. (See Attachment 2) **in addition to the Quarterly reviews.**

One-Stop Operator

The St. Charles County WDB will conduct an annual review of our One-Stop Operator to ensure compliance with the requirements outlined in 20 CFR 678.620 as well as responsibilities outlined in the current MOU/RFP/Contract. The One-Stop Operator will be monitored on a quarterly basis to ensure the Contract's Scope of Work is followed (See Attachment 3):

1. If it is determined that the one-stop operator is not meeting expectations, corrective action will be taken which can include contract termination.
2. If the Local WDB is the One-Stop Operator, an outside entity or State agency will conduct the monitoring and report the monitoring results to the County Executive.

Programmatic Monitoring Plan

WIOA Adult, Dislocated Worker, and Youth files are submitted by staff **as enrollments occur** to monitor for review. Both the Statewide electronic system and the hard copy files are reviewed. The Statewide electronic registration is reviewed for documentation of participant eligibility and/or priority for the programs and services received, orientation to services, orientation and signature of the participant to his/her rights under Complaint & Grievance Procedures, justification for the provision of individualized career services or training services, method of assessment, Individual Training Accounts (ITA), employment planning, the appropriateness and accuracy of participant payments (when applicable), appropriate data entry, and the posting of performance outcomes, **an examination of historical Change Requests, compliance issues cited in prior federal, State, and local reviews, and determine if prior corrective measures have been effective.**

Enrolled WIOA Adult, Dislocated Worker, and Youth hard files are submitted by staff to the Local Compliance Monitor for review. In addition to the above listed issues, files are further

reviewed for justification of training service level, documentation of assessment leading to training choice, correct completion of Individual Training Accounts (ITA), and documentation to show that training is likely to lead to employment. For classroom training, hard copy file is examined for signed paperwork indicating completion of training request and ITA referral to school and appropriate documentation of school in ETPS. For OJT participants, file is examined for appropriate completion of OJT paperwork including signatures of participant and employee representative.

In addition to the above monitoring requirements, Youth monitoring procedures include a review of the out-of-school youth expenditure requirement, 20% work-based learning and educational component requirements, 5% limit on In-School Youth enrolled with the “requires additional assistance” barrier, 5% over income exception, and all new youth eligibility barriers and criteria.

All WIOA program files are submitted again to the Local Compliance Monitor for review at the time of exit. Files are reviewed to make sure activities and programs have all been closed appropriately and include credential attainment information and supplemental data, if applicable. At this time, the Local Compliance Monitor will ensure performance outcomes were reported correctly to ensure compliance with the Data Element Validation (DEV) requirement.

OJT agreements are reviewed again by the Local Compliance Monitor once during the term of the agreement as well as an on-site visit to each subsidized employer worksite in which a questionnaire is used to interview both the participant and representative of the company to determine compliance with the terms of the OJT agreement and progress towards accomplishing the goals set out therein. OJT files are further reviewed to make sure that reimbursements do not exceed 50% of the extraordinary costs of training a participant, appropriateness of length of training, and for accuracy of payments.

Youth Work Experience assignments are monitored once during the term of the agreement in which a questionnaire is used to interview both the participant and a representative of the company to determine compliance with the terms of the Youth Worksite Agreement and progress towards accomplishing the goals set out therein.

(Quarterly Monitoring) Sub-State Monitoring for all WIOA programs (Adult, DW, and Youth) is done on a quarterly basis in order to catch any issues promptly and provide timely feedback to counselors so they can correct errors and/or make changes to procedures in accordance with continuous improvement philosophy. The Local WDB will conduct quarterly Programmatic Monitoring Reviews (PMR) to test compliance in every funding stream for which we are contracted with OWD.

The Local Compliance Monitor uses a random sampling technique to select an appropriate sample size in participant file reviews to test compliance in every funding stream for which the Local WDB has a contract with DHEWD. **The Compliance Monitor will ensure the following services are included in their review: Classroom Training, OJT, Work Experience/Apprenticeships, Supportive Services, and any other service that results in a direct payment to a participant.** This includes stand-alone summer youth programs or other special initiatives in accordance with the contractual scopes of work. These policies are to supplement existing monitoring duties and must be conducted during program operation to assure accountability and transparency of expenditures. Due to the size of the area, this usually results in 100% of files being monitored. At the end of the program year, if the samples from the first 3 quarters have provided an inadequate sample of the program year's populations, an adjustment is made to allow enough additional participant files to be selected to make up the difference and provide an adequate sample for the whole year.

Depending on the size of each record set requiring review, the corresponding number of sample records shown below, at a minimum, must be examined. These guidelines are applicable for every review.

<u>Record Set Size</u>	<u>Sample Size</u>
1 – 20	69
201 – 300	78
301 – 400	84
401 – 500	87
501 – 1,000	96
1,001 – 2,000	100
2,001 – 10,000	105

All regional monitoring procedures include a review of program quality with attention given to continuous improvement efforts as well as an ongoing examination of compliance issues cited in prior federal, state and region reviews and a determination of how well staff is following through with any corrective measures undertaken to address issues. Steps are regularly taken to determine whether previous monitoring efforts are proving effective. Timely individual feedback is provided to staff members who err so they can take corrective action. Ongoing or repeated issues are addressed with individuals, teams and/or with entire staff at weekly meetings.

Financial Monitoring

(Quarterly) The Local WDB will conduct **quarterly** Financial Monitoring Review (FMR) of sub-recipients to ensure fiscal integrity. **At least one of these monitoring reviews will be done on-site.** Additional reviews may be warranted based on evaluations of risk of noncompliance. The

FMR will be performed to comply with WIOA section 184(a)(4) {29 U.S.C. 3244(a)(4)}, annual DHEWD agreements, and 2 CFR Part 200 and Part 2900. The FMR is conducted to ensure the adequacy of internal controls and the reliability of the sub-recipient's financial management system as they relate to the administrative sub-award and the fiscal goal or requirements, and that amounts reported are accurate, allowable, supported by documentation, and properly allocated. The FMR must result in a written report to the Local WDB identifying areas of noncompliance and recommendations for remedy. The FMR must include: but is not limited to, reviews of the following process:

- Audit Resolution/Management Decision;
- Financial Reports;
- Internal Controls;
- Source Documentation;
- Cost Allocation/Indirect Costs;
- Cash Management; and
- Procurement.

Our Local WDB will incorporate additional financial and programmatic monitoring policies to ensure funds intended to support stand-alone summer youth programs or other special initiatives are administered in accordance with the contractual scopes of work. These policies are to supplement existing monitoring duties and must be conducted during program operation to assure accountability and transparency of expenditures.

Equal Opportunity Monitoring

The Local Equal Opportunity Officer (EO) is responsible for the following:

1. Serving as a recipient's liaison with the State EO Officer;
2. Monitoring and investigating the recipient's activities, and the activities of the entities that receive WIOA Title I financial assistance from the recipient including contracted Service Providers (One-Stop Operators, Adult/Dislocated Worker/Youth program providers, small service providers, ETPs, OJT and Work Experience Employers to make sure that the recipient and its subrecipients are not violating their nondiscrimination and equal obligations under WIOA Title I, which includes monitoring the collection of data required in Section 188 of WIOA to ensure compliance with the nondiscrimination and equal opportunity requirements of Section 188 of WIOA, 29 CFR Part 38 and Missouri Nondiscrimination Plan which includes the following sections and elements:

Sections I: Assurances

Section II: Equal Opportunity Officers

Section III: Notice and Communication

Sections IV: Data and Information Collection and Maintenance

Section V: Affirmative Outreach

Section VI: Complaint Processing Procedures

Section VII: Governor's Oversight Responsibilities Regarding Recipients' Recordkeeping

Additional Element Sections:

Element I: Review for Compliance under WIOA Sec 188 (Policies/Contracts/Assurances)

Element II: System to Ensure Compliance with WIOA Sec 188 for Recipients

Element III: System for Reviewing Recipients' Contracts, Assurances & Agreements

Element IV: Ensuring Compliance with WIOA Section 188

Element V: Compliance with Federal Disability Nondiscrimination Laws

Element VI: Training for Compliance under WIOA Section 188

Element VII: Corrective Actions and Sanctions

Element VIII: Supporting Documentation for the NDP

Local EO Officers will be responsible for monitoring small service providers (ETPS, OJTs, Work Experience employers only) defined under 29 CFR 38.4 (hhh) (fewer than 15 beneficiaries or employees). This includes monitoring the small service provider for adopting and publishing complaint procedures and processing complaints, in accordance with Section 188 of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan.

3. Reviewing the recipient's written policies to make sure that those policies are nondiscriminatory;
4. Developing and publishing the recipient's procedures for processing program complaints and grievances. Tracking program complaints and grievances and discrimination complaints filed against the recipient. Developing procedures for investigating and resolving program complaints and grievances filed against the recipient. Assisting the State EO Officer when needed with investigating discrimination complaints against the recipient. Making sure all complaint procedures are followed for filing a complaint, and making them available to the public, in appropriate languages and formats;
5. Conducting outreach and education about equal opportunity and nondiscrimination requirements consistent with §38.40 and how an individual may file a complaint consistent with §38.69;
6. Undergoing training (at the recipient's expense) to maintain competency of the EO Officer and staff, as required by the State EO Officer; and
7. Overseeing the implementation of the Missouri's Nondiscrimination Plan under §38.54 within the local service area; and
8. Providing monthly training on nondiscrimination and equal-opportunity related topics to job center staff.

(Quarterly) The Local WDB will conduct quarterly on-site EO Monitoring which include:

1. Ensuring compliance with the nondiscrimination and equal opportunity provisions of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan, and negotiating , where appropriate, with a recipient to secure voluntary compliance when noncompliance is found under §38.91(b).
2. Quarterly monitoring the compliance of recipients with WIOA Section 188, 29 CFR Part 38 and the Missouri Nondiscrimination Plan, including a determination as to whether each recipient is conducting its WIOA Title I-financially assisted program or activity in a nondiscriminatory way.

At a minimum, each annual monitoring review required must include:

- A statistical or other quantifiable analysis of records and data kept by the recipient under §38.41, including analyses by race/ethnicity, sex, limited English proficiency, preferred language, age, and disability status;
- An investigation of any significant differences identified in paragraph (b)(1) of this section in participation in the programs, activities, or employment provided by the recipient, to determine whether these differences appear to be caused by discrimination. This investigation must be conducted through review of the recipient's records and any other appropriate means; and
- An assessment to determine whether the recipient has fulfilled its administrative obligations (i.e., recordkeeping, notice and communication) and any duties assigned to it under the Missouri Nondiscrimination Plan.

Monitoring Reports

(Annually) The Local WDB will submit annual reports for Financial, Programmatic, One-Stop Operator and EO monitoring each Program Year to our subrecipient. Annual reports must be issued by June 30th of each program year.

1. **Each report will be addressed to the subrecipient, include the date issued, the timeframe of monitoring, all identified issues (if any), the corrective action, along with an explanation of the required corrective action (if any), and a deadline for completion of the corrective action.**
2. **The following reports will be presented at a Board meeting and documented in meeting minutes:**
 - **One-Stop Operator monitoring;**
 - **Programmatic monitoring;**
 - **Financial monitoring;**
 - **Equal Opportunity monitoring;**
 - **Performance reviews monitoring; and**
 - **Special initiatives/grants monitoring.**

3. Areas to cover in monitoring reports include, but are not limited to, adequacy of assessments, planning of activities and services, coordination with One-Stop Delivery System partners to meet the comprehensive needs of customers, and customer outcomes.
4. The regulations implementing WIOA require that when monitoring identifies issues, those issues must be resolved by prompt and appropriate corrective action. Therefore, reports must identify areas of noncompliance and corrective actions taken or required for improvement.
5. The Local WDB is also responsible for providing any technical assistance needs identified through monitoring.

Additional Responsibilities

The Local WDB will ensure business is conducted in an open manner, by making documents available to the public, on a regular basis through electronic means and open meetings. The Local WDB will ensure our website contains the following information:

1. Local Plan and modifications, if applicable;
2. Board members and their affiliations;
3. Selection of one-stop operators;
4. Award of grants or contracts to eligible training providers of workforce investment activities including providers of youth workforce investment activities;
5. Minutes of formal meetings of the Local WDB; and
6. Board by-laws, consistent with 20 CFR679.310(g)

DATA ELEMENT VALIDATION

Per OWD Issuance 07-2020 Statewide Data Element Validation Policy, data validation is a series of internal controls established to:

- Verify that the performance data reported by grant recipients to DOL are valid, accurate, reliable, and comparable across programs;
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts.

This data validation strategy is for WIOA Adult, Dislocated Worker and Youth (conducted by the LWDB WIOA Compliance Monitor), Wagner-Peyser (conducted by Central Office Wagner-Peyser Coordinator), and the Trade Adjustment Assistance (TAA) programs (conducted by the Trade Navigator). Source documentation for all programs can be found in TEGL 23-19 Attachment II.

Data Element Validation (DEV) Procedures:

Staff responsible for conducting DEV reviews:

- Will maintain access to the “PIRL Data Sampling” report;
- Complete quarterly reviews at the beginning of October, January, April and July on both active and exited records (staff are responsible for validating the data for the quarter that just ended);
- Will follow the Data Sampling Desk Aid for selecting data samples;
- Conduct their reviews directly in the Excel Workbook generated by the statewide electronic case management system;
- Mark each element as a “pass” or “fail”. If a “fail” is marked staff must provide an explanation describing why the element failed and corrective action being taken to correct the data, if applicable;
- Will be expected to provide their DEV documentation, when requested, to OWD Regulator Compliance Unit at least annually.

Data Element Validation Training

The St. Charles Region LWDB Compliance Monitor and/or OWD Supervisor will provide training annually to workforce staff on the importance of correct data entry and allowable source documentation requirements contained within OWD’s WIOA Adult/Dislocated Worker TAG, WIOA Youth TAG, and Attachments II of TEGL 23-19.

Correcting Missing or Erroneous Data

If missing or erroneous data is discovered, staff will take the appropriate actions to correct it as outlined below:

- Submit detailed Change Requests to correct inaccurate data;
- Work with the Office of Performance & Strategy/Workforce Data unit to resolve out-of-range variances and/or large quantity of data anomalies;
- Provide additional training or technical assistance to workforce staff responsible for the erroneous data entry, if applicable;
- Collect missing documentation to verify required data elements, if applicable.

Record Retention

- St. Charles Region will retain copies of worksheets on data elements and/or records reviewed and corrective actions taken, if applicable, for a period of three years from the date of submission of the final expenditure report.

Attachment 1 – Pre Award Risk Assessment

St. Charles County LWDB Subcontractor PRE-AWARD Risk Assessment

Please select your entity type:

- o State/Local Government
- o Nonprofit Organization: Please provide number of years in operation:
- o For-profit Organization: Please provide number of years in operation:

The Subrecipient hereby certifies as follows:	Yes	No
Subrecipient’s financial system is in accordance with generally accepted accounting principles		
Subrecipient has the capability to identify in its accounts all federal awards, including flow-through funds, received and expended and from which federal agency they were received		
Subrecipient maintains internal controls to assure federal awards are being managed in compliance with applicable laws, regulations, and the provisions of contracts, grants, and subawards		
Subrecipient financial system includes budgetary controls that preclude incurring obligations in excess of (a) total funds made available under the award and (b) total funds made available for a budget cost category (e.g. personnel, travel, etc.)		
Subrecipient can prepare appropriate invoices, financial reports and statements, including a schedule of expenditures by federal award		
There are no outstanding audit findings that would impact the LWDB’s funding (if there are relevant findings, please submit a copy of the most recent report that describes the finding and the steps being taken to correct it)		
Personnel who have the responsibility of spending, managing, and accounting for the funds awarded are familiar with the applicable cost principles and are able to determine whether costs in connection with federal grants and contracts can be considered to be allocable, allowable, reasonable, and necessary		
Subrecipient has adequate separation of responsibilities so that no one individual has complete authority over an entire financial transaction		
Subrecipient is in compliance with applicable federal law and public policy requirements (such as law and policies governing objectivity in research, civil rights, environmental impact, debarment and suspension, lobbying with federal funds, etc.)		
Subcontractor will make every effort to be in compliance with all requirements of award including reaching required expenditure rates and complying with programmatic review findings		

Information completed by:

Name:	Date:
Title:	Phone:

Signature:

RISK ASSESSMENT WORKSHEET

SCC WD Risk Assessment Worksheet
For Annual Monitoring

Grantee Name:

Period of Review:

Date of Last Review:

Criteria		Low Risk		Medium Risk		High Risk		NOTES:	
		Description	Score (1)	Description	Score (2)	Description	Score (3)		
1a	Organization Experience	Entity has continuous experience managing federal funds for the past 5 or more years		Entity has 2 to 4 years recent experience managing federal funds		Entity is new or has less than 2 years experience managing federal funds			
1b	Responsiveness	Entity has submitted invoices or other requested documents in a timely manner		Entity has periodically submitted invoices or other requested documents in an untimely manner		Entity has frequently submitted invoices or other requested documents in an untimely manner			
1c	Overall staffing	Turnover less than 10% and no staff reduction		Turnover over 10% to 30% and/or staff reduction under 10%		Turnover greater than 30% and/or staff reduction greater than 10%			
1d	Written Procedures	Entity demonstrated effective financial procedures and internal policies		Minor updates or current modifications to financial procedures or other policies		No written financial procedures or other policies or they are inadequate			
Total General Assessment Score								(Min 4, max 12)	NOTES:
2a	Number of years since entity had an on-site monitoring visit	One		Two		Three or more			
2b	Prior monitoring findings	No significant findings for the past 3 years		Significant or unresolved findings in the past 2 years		Significant or unresolved findings annually			
2c	Period since last single audit	1 year		N/A		More than 1 year			

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2d	Significant deficiencies or material weaknesses	Single Audits for any of the last 3 years did not contain either significant deficiencies or material weaknesses		Single Audits for any of the last 3 years contained either significant deficiencies or material weaknesses		Single Audits for each of the last 3 years contained either significant deficiencies or material weaknesses		
2e	High-Risk Designation or Reimbursements	Entity has not been on high-risk or reimbursement within the past 3 years		Entity was released from high-risk or reimbursement within the past 3 years		Entity is currently on high-risk designation or on reimbursement		
Total Monitoring/Audit Assessment Score					(Min 5, max 15)			
3a	Programmatic efforts: allowability of expenses	Personnel responsible for spending and accounting for funds awarded are able to determine costs to be allocable, allowable, reasonable and necessary		Personnel responsible for spending and accounting for funds awarded are not always able to determine costs to be allocable, allowable, reasonable and necessary		Personnel responsible for spending and accounting for funds awarded are not able/ have not been trained to determine costs to be allocable, allowable, reasonable and necessary		<i>Counselors are trained on WIOA requirements and their Supervisor reviews and approves every training expenditure submitted for payment.</i>
3b	Programmatic efforts: meeting expenditure goals	Award compliance is reached including meeting expenditure rates and compliance with programmatic review findings		Minor issues with award compliance including meeting expenditure rates and compliance with programmatic review findings		Major issues with award compliance including meeting expenditure rates and compliance with programmatic review findings		
Total Programmatic Efforts Assessment Score					(Min 2, max 6)			NOTES:
4a	Accounting System	Accounting system is effective and provides receipts and expenditures by grant		Accounting system is limited in capturing receipts and expenses by grant		Accounting system cannot capture receipts and expenditures by grant		
4b	Cost & Time & Effort Tracking	System is effective in tracking costs and time spent on grants		System is open to manual adjustments, application is not consistent or needs improvement		There is an overall lack of effective time and effort reporting and tracking of costs by grant		

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4c	Internal Controls	Entity has an approved indirect cost rate or a written and current cost allocation plan		Entity is in the process of receiving a new indirect cost rate or updating its cost allocation plan		Entity does not have either an approved indirect cost rate or a written cost allocation plan	
4d	Budget Controls	Entity uses budget control mechanism through its accounting system which is shared with program staff		Entity either does not employ budget control mechanisms through its accounting system or share information with program staff		Entity does not have any budget control mechanism in place	<i>The College's invoices track total spent to-date, total budget, and remaining budget which allows them to monitor overall spending</i>
Total Financial Stability Assessment Score					(Min 4, max 12)		
Overall Risk Assessment Score from 15 to 45 [Low, Medium, High]							

Completed by:

Date:

SCORING NOTES:

**Attachment 3 – Quarterly
Monitoring Report**

**ATTACHMENT 4
St. Charles Region**

RISK ASSESSMENT WORKSHEET

SCC WD Risk Assessment Worksheet

QUARTERLY MONITORING

Grantee Name:	St. Charles Community College
Period of Review:	
Date of Last Review:	

Criteria		Low Risk		Medium Risk		High Risk		NOTES:	
		Description	Score (1)	Description	Score (2)	Description	Score (3)		
1a	Resolution of findings from annual fiscal audit	Entity had no findings from prior annual audit		Entity had findings from prior annual audit and some are corrected		Entity had findings from prior annual audit and has not taken corrective action to resolve			
Total General Assessment Score							(Min 1, max 3)		NOTES:
2a	Responsiveness	Entity has submitted invoices or other requested documents in a timely manner		Entity has periodically submitted invoices or other requested documents in an untimely manner		Entity has frequently submitted invoices or other requested documents in an untimely manner			
2b	Overall staffing	Turnover less than 10% and no staff reduction		Turnover over 10% to 30% and/or staff reduction under 10%		Turnover greater than 30% and/or staff reduction > 10%			
Total Monitoring/Audit Assessment Score							(Min 2, max 6)		
3a	Programmatic efforts: allowability of expenses	Personnel responsible for spending and accounting for funds awarded are able to determine costs to be allocable, allowable, reasonable and necessary		Personnel responsible for spending and accounting for funds awarded are not always able to determine costs to be allocable, allowable, reasonable and necessary		Personnel responsible for spending and accounting for funds awarded are not able/have not been trained to determine costs to be allocable, allowable, reasonable and necessary		<i>Counselors are trained on WIOA requirements and their Supervisor reviews and approves every training expenditure submitted for payment.</i>	
3b	Programmatic efforts: meeting expenditure goals (80% total budget spent by June 30 and 30% on Clients)	Award compliance is reached including meeting expenditure rates and compliance with programmatic review findings		Minor issues with award compliance including meeting expenditure rates and compliance with programmatic review findings		Major issues with award compliance including meeting expenditure rates and compliance with programmatic review findings			
Total Programmatic Efforts Assessment Score							(Min 2, max 6)		NOTES:

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4a	Cost & Time & Effort Tracking	System is effective in tracking costs and time spent on grants		System is open to manual adjustments, application is not consistent or needs improvement		There is an overall lack of effective time and effort reporting and tracking of costs by grant	
4b	Budget Controls	Entity uses budget control mechanism through its accounting system which is shared with program staff		Entity either does not employ budget control mechanisms through its accounting system or share information with program staff		Entity does not have any budget control mechanism in place	<i>The College's invoices track total spent to-date, total budget, and remaining budget which allows them to monitor overall spending</i>
Total Financial Stability Assessment Score					(Min 2, max 6)		
Overall Risk Assessment Score from 7 to 21							
[Low 7-11, Medium 12-16, High 17-21]							

Completed by:

Date:

FISCAL > COMMUNITY COLLEGE DOCUMENTS > SCC WD Risk Assessment Worksheet-QUARTERLY MONITORING
Attachment 3 – Quarterly Monitoring Report

**ONE-STOP OPERATOR MONITORING TOOL (per guidance from TEGL 15-16 and
OWD Issuance 11-2021)**

One-Stop Operator Services

Identifier	Objective	Meeting Expectation		Technical Assistance Required		Comments
		Yes	No	Yes	No	
Are staff functioning as an integral part of the Missouri Job Center to provide meaningful access evident in the comprehensive One Stop Center	Interactions of all partner organizations to provide seamless service delivery across program funding streams					
	Coordinates customer flow to ensure the provision of high-quality customer service					
	Coordinates staffing patterns to ensure a high quality of service is provided to job center customers					
	Has center staff been cross-trained to communicate availability of all WIOA services? Are staff meetings relevant?					
	Is cross-training and guidance ongoing?					

	Are Adult & DW reports provided as requested?					
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Outreach and Recruitment

Identifier	Objective	Meeting Expectation		Technical Assistance Required		Comments
		Yes	No	Yes	No	
Develop and/or maintain community, Education, and business & economic development partnerships	Conduct marketing campaigns to job seekers and customers seeking career services					
	Engage community partners in priority populations					
	Outreach to new business partners to promote programs					
	Collaborate with SCCWDB staff for all outreach efforts					
	Investigate access points to make WIOA career services accessible to residents in community centers, libraries, and with community-based organizations					
	Participate in Rapid Response/ETT services when allowed					
OSO & LWDB Communication	Does the OSO share system information					

	(success, challenges)?					
	Does the OSO make recommendations for improvement					

Customer Satisfaction and Performance Outcomes

Identifier	Objective	Meeting Expectation		Technical Assistance Required		Comments
		Yes	No	Yes	No	
Evaluation of Service Delivery	Commit to continuous improvement by developing and implementing customer satisfaction evaluations					
	Do survey outcomes result in system improvements, as applicable?					
	Maximize resources made available throughout the system (workshops, activities, etc.)					
Data Driven Performance Strategy	Collaborate with the One-Stop partners to bring integrated and additional services to the One-Stop Center and improve customer access to One Stop Partner services					
	Meet or exceed all WIOA State requirements					

	concerning enrollments and obligations					
	Meet or exceed all WIOA Local Performance measures					
	Track WIOA enrollments on progress and outcomes and address deficiencies					

Compliance Monitor Self Attestation

TEGL 15-16 and OWD Issuance 11-2021 states that Local WDBs are required to monitor their One-Stop Operator’s adherence to the contract/RFP.

I, _____, *the St. Charles Region’s Compliance Monitor*, have completed the One-Stop Operator review on _____ **(Date)** in a fair and impartial manner. I further attest that I have examined compliance with the requirements of the following:

- WIOA Regulations
- Uniform Guidance at 2 CFR part 200 & part 2900
- The terms and conditions of the RFP and Contract with the One-Stop Operator

Compliance Monitor

One-Stop Operator