

THE SCSEP MONITORING CONTINUUM

- Tracking Grant Operations Against Performance Objectives
- Tracking Compliance with Statutory and Administrative Requirements

FISCAL FILES & PRACTICES TO BE REVIEWED

Fiscal Integrity

- Appropriate checks and balances in place for handling payroll and other expenses
- Time cards all signed and dated
- Time cards agree with payroll worksheets and general ledgers
- Bank statements verified
- No white-out!

DOL Fiscal Monitoring Focus

1. Participant record review
 - a. Eligibility determination
 - b. Participant records

2. Financial management integrity
 - a. Participant payroll system
 - b. accounting system
 - c. Financial status procedures

d. Cash management

e. Procurement

f. Property control

g. Travel procedures

h. Audits

3. Administrative Review

a. Staffing and staff payroll

Source Documentation for Costs

■ Labor Costs

- Staff/participant time sheets
- Payroll records
- Payment documents
 - canceled checks
 - direct deposit confirmations

■ Benefits

- Insurance invoices
- Requests for leave

Participant Records

- Evidence of eligibility
 - income statements
 - proof of status
- Support service payments
 - signed receipts
 - vendor invoices for services
- Training
 - registration documents

Contract Documents

- Subgrants
 - appropriate work statements
 - appropriate clauses
- Subcontractor invoices
 - with appropriate cost breakouts
- Procurement
 - requests for bid (RFP) with price comparisons
- Modifications
- Performance data
- Closeout documents

PARTICIPANT MONITORING REVIEW

What Program Monitors Look For at the Subgrant Level

- Local office operation and procedures for eligibility, enrollment, orientation, etc.
- Office records (staff and participant files)
- Training practices
- Unsubsidized placement results and efforts to increase placements
- Assessment process procedures; quality of IEPs
- Host agencies and host agency practices
- Relationships with local WIB and one-stop.
- Program monitors observe participants at work in host agencies.

1. Administrative Issues

- a. Grantee self-assessment
- b. Grantee linkage efforts

2. Validation of Reported Outcomes

- a. Financial Status Report
- b. Quarterly Progress Report

3. Review of Statements in Planning Documents & Regulatory Requirements

- a. Notice of Intent
- b. Responsibility review
- c. Program management systems
- d. Master plan
- e. Comprehensive annual plan

4. Management Practices

- Compliance with the law and regulations
- Adherence to grantee narrative and grantee policies and procedures
- Local office operation and procedures for eligibility, enrollment, orientation, etc.
- Local plan of action for meeting performance goals
- Adequate staffing and staff supervision

5. Coordination and Cooperation

- All coordination mandates documented in the file
 - WIA system
 - State Unit on Aging
 - Equitable Distribution
 - State 4-year Strategic Plan
 - Area Agencies on Aging
 - Slot allocation and locations
 - Support Services
 - Other SCSEP grantees
 - WIA relationships
 - Host agencies utilized

6. Host Agency Relationships

- Files complete, with necessary signatures and dates
- Annual monitoring documented w/all necessary follow-up
- MOE checks in place
- New host agencies recruited in compliance with State Plan

7. Participant Practices

- All files and documentation in order
- Quality of assessments and IEPs
- Quality of supervision and training at host agencies
- Occupational training supplementing host agency training
- Supports for seeking unsubsidized job
- Follow-up practices and procedures

What Else Your FPO Is Looking For ...

RECRUITMENT / Service Level

- How will local awareness of the program be broadened in order to recruit eligible individuals to the program
 - Specific outreach efforts that will be made in local communities to raise program awareness
 - how outreach efforts will be specifically designed to attract priority individuals with barriers (most in need)
 - How recruitment goals for the target population will be consistently met
 - How they will ensure that all vacant positions remain filled as program participants exit for unsubsidized employment

Participant Eligibility

- How project ensures individuals applying to the program (& recerts) meet the eligibility criteria
 - Procedures to ensure accuracy of individuals' income and age eligibility
 - Procedures to ensure individuals are unemployed at the time of enrollment and while enrolled in the program
 - Plans for ensuring that the veterans' priority and SCSEP priorities are properly implemented

Assessments and IEPs / Most in Need

- How participants are continually assessed & how IEP is used to ensure participants are trained for viable employment opportunities
 - How often completed
 - How the training and services reflected on the IEP will enhance/improve the participant's skills and lead to higher level skills that enhance employability
 - Procedures in place to ensure that participants acknowledge and agree with the training plan
 - How assessments capture assistance needed
 - Policies that assure projects consistently document activities and execute the IEP plans
 - How felony background checks will be applied consistently to all participants, and where the information will be maintained

Orientation

- How program participants and host agencies are introduced to program requirements, roles and responsibilities; permissible and impermissible activities
- General timeframes for when orientation will occur and how often

Community Service Training

- How participants are trained through community service organizations
- How staff ensures that work-based training is of high quality; consistent with participant IEP
- How this training will lead to unsubsidized employment
- How host agency organizations are recruited and selected; factors used to determine whether the host agency will provide quality job training

- Plans to ensure maintenance of effort compliance; action steps if a maintenance of effort violation is discovered
- How adequate participant supervision during training hours is ensured
- Procedures for rotating participants to other host agency assignments
- Plans and procedures for documenting and ensuring host agencies are either public agencies or have 501(c)(3) designation; how such records are maintained
- Procedures for terminating host agency relationships; circumstances that would create cause for termination (e.g. MOE violations, inaccurate timekeeping, poor training opportunities, failing to fulfill contractual responsibilities, etc.)

Other Training

- What training is offered, required, and/or provided to program participants and host agencies
- Plans for ensuring regular training of staff on program operations, new initiatives, and innovative ideas
- Types of permissible training offered to participants
- How computer training is provided to participants; how community colleges are utilized for computer and other training opportunities

Fringe Benefits

- Compliance with 2010 regulations
- How Federal Holiday provision is managed

Supportive Services

- What supportive services are offered to participants
- What additional resources are used to support those services
- What supportive services are offered once participants are placed in unsubsidized jobs to help retention

Unsubsidized Employment

- Plans to place participants in high growth jobs according to local labor market data
- How targeted jobs will enable participants to become self-sufficient in positions they would not have otherwise had the necessary skill training provided by the program

Terminations

- 2010 Regulations followed for all participant terminations
- Special review to ascertain:
 - Durational limit policy followed
 - Criteria used for “for cause” terminations

Confidentiality of Files

- How participant files are kept confidential from personnel not affiliated with the project
- How volunteer compliance with the confidentiality requirements is ensured

Complaint Resolution Process

- Process in place for program applicants, participants and/or host agency complaints or grievances without Federal intervention
- Process prior to Federal appeal for complaints involving illegal acts or discrimination