



OVERVIEW OF SUBCONTRACT, POLICY, and AGREEMENT MONITORING

Presented by:
Bureau of Workforce Development Administration, Oversight Services
July 17, 2025



PURPOSE

In today's training, you will learn:

1. BWDA's requests for information pertaining to procurement and subcontract monitoring, policy and agreement monitoring, and the purpose of collecting the information.
2. Submitting the requested documentation in CWDS.
3. What gets reviewed during BWDA's monitoring review of these two sections.



Section 1:

BWDA Procurement/Subcontract and Policy/Agreement Monitoring Requests

What you need to submit...



Procurement and Sub-Contract Documentation Request

Requests are generated at the beginning of October and due mid-October.

1. A copy of all LWDA WIOA-funded sub-recipient/service provider contracts effective within the program year being monitored. This includes, but is not limited to, the main Title I services provider contract(s) for Adult/Dislocated Worker/Youth services, the One-Stop Operator contract, and any other contract involving the provision of WIOA-funded services of any type.
2. Copies of the Requests for Proposal (RFPs) for all applicable contracts effective within the program year being monitored, including any attachments.
3. Copies of the Public Notice for RFPs or Bid Solicitations for all applicable contracts effective within the program year being monitored.
4. Copies of all bids or RFP responses received for all applicable contracts effective within the program year being monitored or documentation of the need for a sole-source or non-competitive procurement.
5. Copies of the completed scoring instruments used to select bidders as well as signed Conflict of Interest Code forms for any non-board members taking part in the scoring process.
6. Copies of all committee meeting minutes where the procurement was discussed, or providers were recommended to the LWDB for consideration.

Policy and Agreements Documentation Request

Requests are generated at the beginning of November and due mid-November.

1. A copy of the LWDB's most current, approved bylaws.
2. A copy of the latest executed chief elected official (CEO) agreement (if applicable).
3. A copy of the latest executed CEO – Fiscal Agent agreement
4. A copy of the latest executed CEO – LWDB Partnership agreement
5. A copy of the latest fully executed MOU and Operating Budget and any modifications
6. Copies of any LWDB policies and procedures pertaining to financial management, which may include the procurement policy, cost allocation plan, cash management, internal controls, cost reimbursement, inventory and equipment, program income, travel reimbursement, audit requirements and resolution, property management, debt collection, or allowable costs.



Policy and Agreements Documentation Request (Cont'd)

Requests are generated at the beginning of November and due mid-November.

7. Copies of any LWDB policies and processes pertaining to program management, which may include equal opportunity, supportive services, needs-related payments, incentive payments, file management, program eligibility, self-sufficiency criteria, ITAs, layoff assistance, priority of service, grievances for eligible training providers list, transitional jobs, and training verification/refunds.
8. Copies of any LWDB risk management policies and procedures, which may include risk assessment, record retention and public access, public record requests, personally identifiable information (PII)/data security, monitoring, grievances, incident reporting, and disaster recovery planning.
9. Copies of any LWDB human resources policies, which may include an employee handbook or other policy pertaining to employee classification, benefits, holidays and PTO, recruitment and selection, employee development, discipline, layoffs/termination/severance, sexual harassment, and equal opportunity/non-discrimination.
10. Copies of any other LWDB policies or procedures not covered specifically in the above categories but which pertain to the LWDB, its staff, or any sub-recipient or service provider.



Policy and Agreements Documentation Considerations

Following are some items LWDBs should consider as policies and agreements are created, reviewed/revise, and submitted:

- Policies and agreements, including the bylaws, should be dated with the original LWDB approval date. This will ensure Oversight Services is reviewing the latest version approved by the LWDB. If a policy or an agreement is still in draft form, the document should note this.
- Policies and agreements should be reviewed and revised, if necessary, on some sort or regular schedule, if not required by federal or state regulation or policy. This schedule can be set by the LWDB and ensures the policy and procedure documents match current operational standards.
- The three governance agreements (the CEO, CEO – Fiscal Agent, and CEO – LWDB Partnership) must be reviewed and acknowledge or changed each time a new CEO is elected.
- LWDB bylaws should be regularly reviewed to ensure they are compliant with L&I's Local Governance Policy.
- Oversight Services compiles this information in part to fulfill requests from stakeholders who monitor L&I making it vital this documentation gets submitted into CWDS completely and timely.



Section 2:

How to submit the requested documentation to Oversight Services via CWDS

CWDS Online Monitoring

Program Year Monitoring Highlight - Dashboard



Commonwealth Workforce
Development System

[UAT]

HOME

SEARCH

APPS

ACCESSIBILITY

HELP



Hi WFI
PA CAREERLINK LEHIGH VALLEY
AT ALLENTOWN

LWDB MONITORING



Dashboard



Monitoring Activities >



Board Members &
Contacts Search



Manage Meetings

LWDB Monitoring Dashboard

Monitoring Activities [view all](#)



PY24 - Sunshine Act Review

Status: + New

Due Date: 06/28/2024

Created By: Erb, Melanie

Release Date: 06/25/2024

PY24 Policies and Agreement - Document Ask

Status: + New

Due Date: 06/28/2024

Created By: Erb, Melanie

Release Date: 06/25/2024

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Extension Requests - Decisions



There are no Extension Requests

Monitoring Results - Preliminary



Monitoring Results - Final



Monitoring Results - Responses



CWDS Online Monitoring


Program Year Monitoring Highlight – Document Request



Questions Documents Extensions Reviews Results Notes

▼ Document Request: 5. MOU/Operating Budget

Description of Document Request
A copy of the latest executed MOU/Operating Budget and any modifications.

UPLOAD DATE	FILE NAME / URL	UPLOADED BY	DESCRIPTION	ACTIONS
 There are no documents uploaded.				

[ADD DOCUMENTS](#) [ADD DOCUMENT URL](#) [ADD PREVIOUS PLAN DOCUMENTS](#)

> Document Request: 4. LEO – LWDB Agreement

> Document Request: 3. LEO – Fiscal Agent Agreement

> Document Request: 2. Fully Executed Local Elected Official (LEO) Agreement

> Document Request: 1. LWDB Bylaws

BACK SUBMIT

CWDS Online Monitoring

Program Year Monitoring Highlight – Extension Request



Policies and Agreement - Document Ask

Add Request close

Request Information

EXTENSION DAYS *(required)*

EXPLANATION *(required)*

0 characters of 1500

CANCEL **SAVE**

Reviews | Resu

be made on or b

STATUS

ADD REQUEST



Section 3:

**What gets reviewed in BWDA's
Procurement/Sub-Contract and
Policy/Agreement monitoring
reviews?**

CWDS Online Monitoring

Program Year Monitoring Highlights – Monitoring Tool



PY 2024 - Section 1 – Procurement and Subcontract

Please contact your assigned Oversight Services analyst for additional support and resources.

Questions	Documents	Extensions	Reviews	Results	Notes
QUESTION	CITATION	RESPONSE	EXPLANATION	ACTIONS	
If the Procurement Policy has changed since the PY 2023 monitoring, does the LWDB's procurement policy address items A-M:	Workforce System Policy No. 03-2015, <i>Financial Management Policy</i> , Financial Management Guide 2021, Procurement Methods, p. 127-128	N/A	-		
A. Selection of WIOA services/contracts?	2 CFR § 200.320	-	-		
B. Micro-Purchase (less than \$10,000)?		-	-		
C. Small purchase (\$10,000 - \$249,999)?		-	-		
D. Sealed bids purchases (greater than \$23,200)?		-	-		
E. Competitive proposal purchases (greater than \$250,000)?		-	-		
F. Noncompetitive purchases (special circumstances which are applicable for all purchase levels)?		-	-		
G. Sole Source purchases?		-	-		
H. Procurement thresholds which are numerical ranges that identify whether quotes, cost analysis, or formal bidding is sufficient	Workforce System Policy No. 03-2015, <i>Financial Management Policy</i> , Financial Management Guide 2021, Chapter 9: Procurement	-	-		
I. Code of Conduct/Conflict of Interest/Dispute Resolution?	Workforce System Policy No. 03-2015, <i>Financial Management Policy</i> , Financial Management Guide 2021 Procurement General Standards and Practice Elem... view more	-	-		
J. Pre-award review procedures?	Workforce System Policy No. 03-2015, <i>Financial Management Policy</i> , Financial Management Guide 2021, Pre-Award Review Procedures, p. 125	-	-		

CWDS Online Monitoring

Program Year Monitoring Highlights – Monitoring Tool



PY 2024 - Section 2 – LWDB Policies and Agreements

Please contact your assigned Oversight Services analyst for additional support and resources.

Questions	Documents	Extensions	Reviews	Results	Notes
QUESTION	CITATION	RESPONSE	EXPLANATION	ACTIONS	
Have the Local Board's policies been updated since the Bureau's most recent review of the LWDB's Local/Regional plan? Please indicate yes or no below ... view more	-	-			
Agreement between all counties and other local governments, if applicable, establishing the consortium of chief elected official(s) (CEO Agreement)?	-	-			
Agreement between the chief elected official(s) and the fiscal agent, if a fiscal agent is designated?	-	-			
Agreement between the chief elected official(s) and the local workforce development board?	-	-			
Memorandum of Understanding?	-	-			
Infrastructure Funding Agreement? (Should be part of MOU)	-	-			
Operating Budget(s)?	-	-			
Local workforce development board policy and process that provides for nomination, appointment, and removal of board members; resolutions; bylaws; cod... view more	-	-			
Financial management policy and process including cost allocation plan, internal controls, cash management, receipts of goods, cost reimbursement, inv... view more	-	-			
Local procurement policy?	-	-			
Program management policy and process including equal opportunity for customers, supportive services, needs-related payments, incentive payments, file... view more	-	-			
Risk management policy and process including records retention and public access, public records requests, monitoring, grievance, incident, and disast... view more	-	-			
Human resources policy and process including employee classification; benefits; holidays and PTO; recruitment and selection; employee development; dis... view more	-	-			

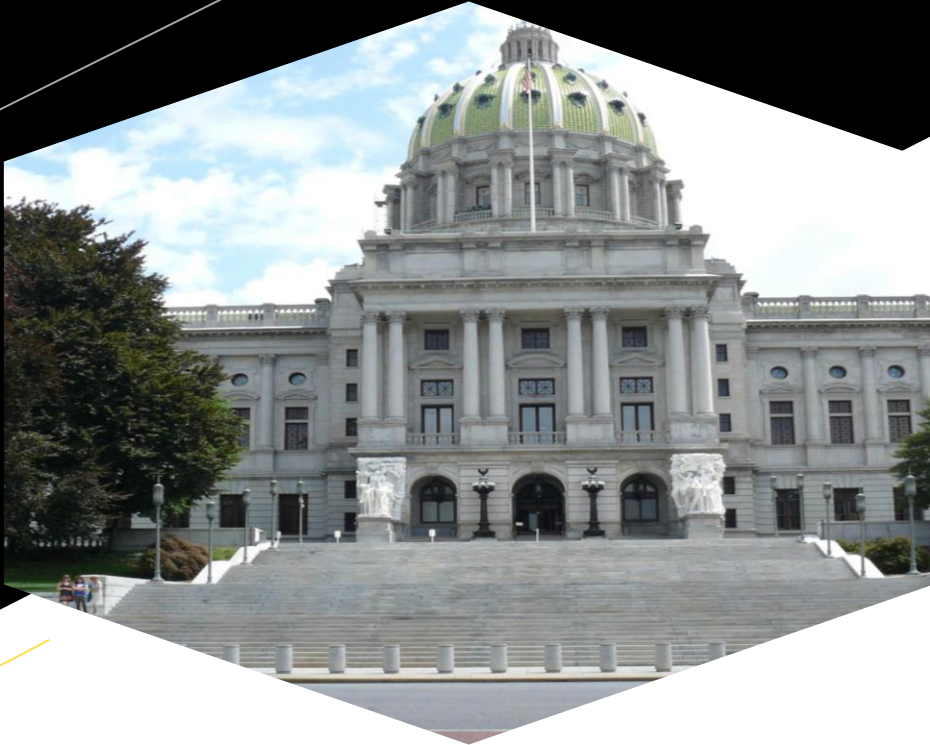


Procurement/Sub-Contract and Policies/Agreements

Common Causes for Findings

- Procurement scoring sheets do not contain a detailed scoring rubric or it appears arbitrarily scored.
- Procurement committee meeting minutes where recommendations are made to the LWDB are not present.
- Non-LWDB member Procurement Committee members have not completed a Conflict of Interest Code form prior to scoring bids.
- Policies/Agreements are either unsigned or undated. (e.g. the MOU is missing partner signatures)
- The bylaws are not compliant with L&I's Local Governance Policy.





Thank you!



Greg Hart, Oversight Services Supervisor



RA-LI-BWDA-OS@pa.gov



<https://www.dli.pa.gov>