



OVERVIEW OF LOCAL MONITORING

Presented by:
Bureau of Workforce Development Administration, Oversight Services
March 20, 2025





PURPOSE

In today's training, you will learn:

1. BWDA's latest request for information pertaining to fiscal integrity and local board monitoring and the purpose of collecting the information.
2. What gets reviewed during BWDA's LWDB monitoring review
3. Requirements of LWDB monitoring of subrecipients
4. Reporting and Resolution





Section 1:

BWDA PY 2024 March 2025 Monitoring Document Request

What you need to submit...





Local Monitoring Documentation Request

BWDA request generated 03-01-2025. Due 03-21-2025.

Fiscal Integrity Items requested:

1. A listing of all WIOA expenditures for PY 2024 to current.
2. Copies of the completed 2023 Statement of Financial Interests forms (due May 1, 2024) for LWDB staff directors and senior-level fiscal agent personnel at the LWDB office possessing the authority to review or approve expenditures or the allocation of funds.
3. All timesheets and payroll documentation for LWDB staff, which shows distribution of time and pay across program and administrative funding streams as well as annual salary, for the period December 2024 and January 2025.
4. A completed copy of the PY2024 Separation of Duties worksheet.
5. A copy of the most recent completed Single Audit.





Local Monitoring Documentation Request

Local Monitoring Items Requested:

1. A copy of the local area's current local oversight plan and completed subrecipient risk assessment.
2. Copies of completed monitoring tools, reports, and corrective action plans/resolution reviews for the monitoring of the WIOA Title I program, including formula-funded activities, activities using WIOA discretionary funds, and specialized WIOA-funded National Dislocated Worker Grant programs. This includes any monitoring of ITA providers and OJT employers.
3. Copies of completed monitoring tools, reports, and corrective action plans/resolution reviews pertaining to the certification of each PA CareerLink® comprehensive site, affiliate site, and/or specialized center, including mobile service sites within the local area.
4. Copies of completed monitoring tools, reports, and corrective action plans/resolution reviews for the monitoring of the One-Stop Operator and its performance.
5. Blank copies of any relevant monitoring tools not used to monitor the local workforce system in PY 2024.

Some monitoring worksheets that we had previously requested to be completed by the local areas are now reflected in the CWDS Activity questions. These questions in activities 4a and 4b must also be completed by March 21, 2025.

A note about local monitoring: Documentation from any PY2024 monitoring performed by a local area between the due date until June 30, 2025, must be submitted to BWDA no later than Tuesday, July 15, 2025, at Noon. This will allow Oversight Services time to meet its monitoring and reporting deadlines for the organizations which monitor L&I. This is not currently enshrined in policy; however, it has been determined to be necessary to keep up with compliance obligations and requirements. Local areas should plan their local monitoring accordingly to avoid compliance findings or concerns.



Section 2:

What gets reviewed in BWDA's LWDB monitoring review?






Monitoring of Plans, Tools, & Risk Assessments

BWDA will review the LWDB subrecipient monitoring plans, tools, and local policies to ensure compliance with the Bureau's [Oversight and Monitoring Policy](#), [Financial Management Policy](#), and [Financial Management Guide \(FMG\)](#).

LWDBs must provide completed monitoring tools for each subrecipient during the program year to verify:

- Completed **administrative**, **programmatic**, and **fiscal** monitoring for compliance with federal, state and local laws, regulations, contract provisions/grant agreements, policies, and official directives, and compliance with the appropriate uniform administrative requirements for grants and agreements.
 - Risk assessment which determines the frequency of subrecipient monitoring.
 - Reporting and resolution requirements.
 - Documented controls through documented monitoring reports and follow-up meetings with subrecipients.
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Monitoring Tools

Common Causes for Findings

- Missing contract amount
- Comprehensive identification of types of services being provided
- Complete list of 14 Youth elements
- Child abuse clearances review
- Work permits for minors
- Parental permission for minors under 16 working





Section 3:

Requirements of Local Monitoring of Subrecipients



Local Oversight/Monitoring Plan

The local oversight plan must be designed to demonstrate that the LWDB can meet the requirements of the grant agreement, on time and within cost limits, and must identify the purpose of performing the oversight activities.

At a minimum, the local oversight plan **must** address:

Oversight Process

Risk Assessment

Frequency

Schedule and Timeline for the current PY





Risk Assessment

LWDBs are required to incorporate a risk-assessment approach as part of the Oversight Plan.

Risk assessment results must inform the frequency and manner in which oversight will take place.

- The risk assessment **must**:
 - Assess risk.
 - Identify frequency in which to monitor subrecipients.
 - Identify the factors used to assess risk. **At a minimum**, the following must be evaluated:
 - ✓ Is the service provider new to operating or managing a state or federal funds, or has not done so within the past five years?
 - ✓ Whether the sub-recipient has new personnel or new or substantially changed systems.
 - ✓ The extent and results of Federal awarding agency monitoring.
 - ✓ Does the provider lack effective operational and fiscal procedures and controls?
 - ✓ The results of previous audits including whether the sub-recipient receives a Single Audit in accordance with 2 CFR 200, Subpart F, and the extent to which the same or similar sub-award has been audited as a major program.
 - ✓ What is the contractor's share of the local area's allocation?
- Project the risk by assigning well-defined, supported point values to a scoring system. The numerical ratings must be used to determine overall risk, and how often to monitor each subrecipient. Local boards must classify service providers as high-risk, medium-risk, or low-risk.





Administrative Oversight

Must be completed at least once per program year.

- Local Governance
- Local Plans and Agreements
- Local Board compliance and certification
- PA CareerLink[®] certification criteria compliance
- PA Sunshine Act compliance





Programmatic Oversight

Must be conducted at least quarterly.

- Program management and standards
- Program policies and procedures
- Service delivery
- Participant eligibility
- Sub-recipient monitoring activities
- Supportive services and need related payments
- Youth activities
- Data element validation





Fiscal Oversight and Reporting

Must be conducted at least once during the contract period.

- Fiscal policies and procedures
- Sub-recipient monitoring activities
- Cost allocation and allowability
- Cash management practices
- Procurement practices
- Internal controls
- Audits
- Program income reporting



One-Stop Operator (OSO) Monitoring

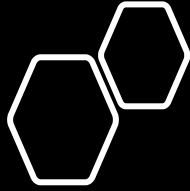
Must be evaluated at least annually.

Evaluation must include, but is not limited to:

- OSO contract provisions
- Participating partner surveys
- Other performance measures developed by the LWDB.

Must be consistent with PA CareerLink® certification requirements.





Evaluate Your Local Monitoring Plans

At minimum, monitoring of administrative functions must be completed **at least once per program year**, monitoring of programmatic activities must be conducted **at least quarterly**, and fiscal monitoring must be conducted **at least once during the contract period**.

Conducting monitoring early in the program year

- Allows local areas to accurately determine the sub-recipient risk assessment level in order to develop the monitoring schedule/frequency.
- Ensures that an entity can meet the requirements of the grant agreement on time and within cost limitations.
- Identifies instances of noncompliance and provides recommendations for corrective action for timely resolution within the program year.
- Evaluates the effectiveness of oversight processes.
- Provides timely and required monitoring documentation to BWDA and ETA.



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Section 4

Reporting and Resolution Requirements



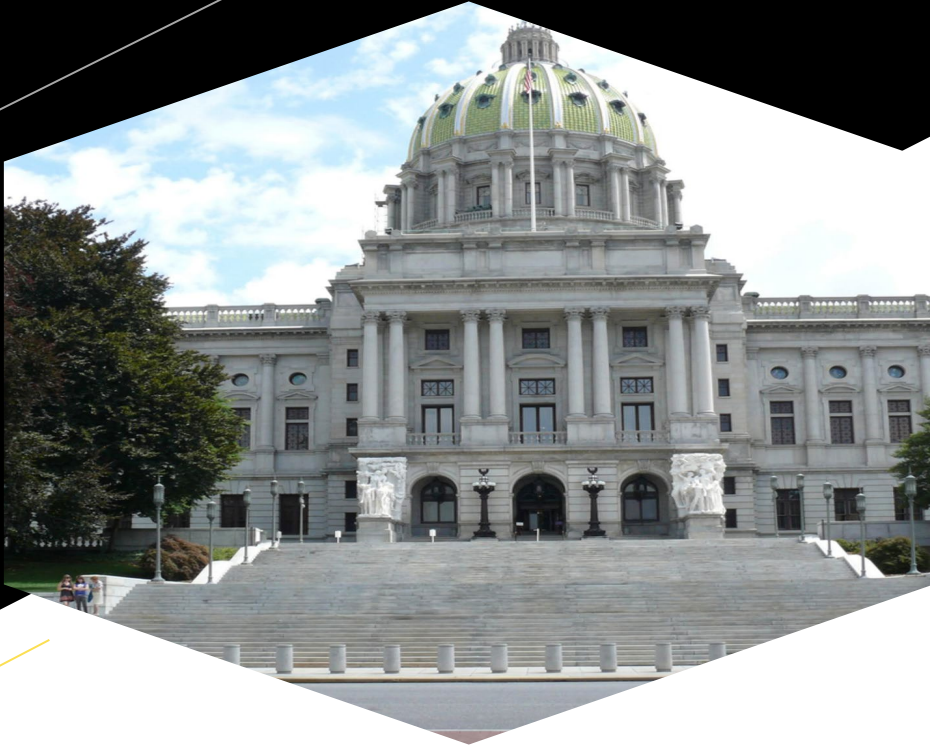


Reporting and Resolution Requirements

- Must provide a copy of the oversight report to the monitored entity.
- The oversight report must identify issues of non-compliance and provide recommendations for corrective actions.
- A written timeline for completing corrective actions must be identified.
- Periodic reports from service providers outlining monitoring reviews, noncompliance issues, and the status of corrective actions
- Ensure that a briefing regarding oversight activities and findings is provided to the local workforce development board at regularly scheduled meetings, and that the briefing is documented
- Perform an annual evaluation of the oversight function to determine its effectiveness
- Develop the written oversight process to be used in the provision of oversight

Must have a written policy in place that describes the entity's appeals process, which must include, at a minimum: timelines, levels of appeal, requests, reviews, adverse and favorable determinations, and resolutions. The required local appeals policy must be consistent with the process outlined in L&I's Sanctions Policy.





Thank you!



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