



Overview of Common Monitoring Findings

May 15, 2025



Presentation Goals

In this presentation, we will review:

- The difference between a finding and a concern.
- Common Administrative Findings
- Common Fiscal Integrity Findings
- Common Programmatic Findings
- How to avoid findings





What is a Finding and how is it Different from a Concern?

A brief review





What is a Monitoring Finding?

- A. An incidence of non-compliance with a federal, state, or local statute, regulation, policy, guidance, etc.
- B. An opportunity to provide technical assistance to ensure LWDBs are falling on the correct side of the compliance line.
- C. An indictment of the LWDB and its providers' ability to properly perform basic compliance functions
- D. A and B.
- E. All of the above.

Place your guesses in the chat.





What is a finding?

Anyone who answered letter D, or A and B, in our pop quiz is correct!

A finding exists solely to identify a citable area of non-compliance and provides an opportunity for technical assistance.

It is not an indictment of a local area's ability to remain in compliance. Monitoring helps determine whether a finding is the result of an isolated incident or indicative of a larger, systemic issue.

At its core, monitoring should feel like an open-book test and findings a learning opportunity.

BWDA's resolution-based monitoring process has greatly reduced the overall number of findings.





How do Findings Differ from Concerns?

Broadly, concerns:

- Indicate the presence of an activity which is not yet non-compliant but without corrective action is likely to result in non-compliance within the next year's monitoring.
- During PY 2023 monitoring, some programmatic findings were considered to be concerns if the non-compliance was determined to be an isolated incident.





Common Administrative Findings





Policies & Agreements

- The requested documentation was not provided or not provided timely.
- Missing disaster recovery plan.
- The MOU does not include all required signatures.
- The MOU wasn't revised or reviewed and signed off on by a newly elected CEO within 180 days.
- The CEO agreement was not revised or reviewed and signed off on by a newly elected CEO within 180 days
- The LWDB does not have a supervisory/second-level review policy.





Sunshine Act

- The requested documentation was not provided or not provided timely.
- Failure to publicly advertise the LWDB and Executive Committee meetings within the timeframe required by the PA Sunshine Act in a newspaper of general circulation within the local area
- The LWDB and Executive Committee meetings were not provided for the entire year in the first public notice of the program/calendar year.
- Failure to provide public notice of LWDB/Executive Committee meetings on the LWDB website.
- Failure to ensure a copy of the agenda was posted on the LWDB's website no later than 24 hours prior to the LWDB/Executive Committee meeting.
- Neither the time or location of the meeting was listed in the public notice
- Failure to provide public notice of a rescheduled, special, or emergency meeting prior to 24 hours before the meeting.





Local Monitoring/Admin Functions

- The requested documentation was not provided or not provided timely.
- Missing risk assessment elements.
- The local monitoring tools had missing required monitoring elements.
- Insufficient local monitoring documentation
- The corrective action/resolution process was not properly documented.
- The providers were not monitored according to the LWDB's monitoring policy/plan or risk level.





Technical Assistance Resources

- Pennsylvania Sunshine Act, 65 Pa. C.S. Part II, Chapter 7 (2021)
- L&I's Memorandum of Understanding policy
- L&I's Regional & Local Area Plans policy
- L&I's Oversight & Monitoring policy





Common Fiscal Integrity Findings





Procurement & Subcontract Review

- The requested documentation was not provided or not provided timely.
- The procurement process lacked detail.
- The bid scoring was not adequately defined.
- The contract did not include the required elements/assurances
- The contract project narrative or budget was not adequately defined.
- The Stevens Amendment was not in the RFP.





Fiscal Integrity

- The requested documentation was not provided or not provided timely.
- Late FSR(s)
- The expenditure reported on the incorrect FSR.
- Inadequate expenditure supporting documentation.
- Staff time was not properly allocated for the work performed.
- Staff exceeded the Executive Level II salary cap.





Audit Results

- The requested documentation was not provided or not provided timely.
- The audit report was not filed timely.





Technical Assistance Resources

- The Uniform Administrative Guidance (2 CFR 200)
- L&I's Financial Management policy – Financial Management Guide (FMG)
- L&I's Oversight & Monitoring policy





Common Programmatic Findings





Service Delivery/Case File Reviews

- The requested documentation was not provided or not provided timely or was not in the system of record.
- The PA CareerLink® comprehensive site did not have access to all required partners.
- Missing or untimely entry of participant services/case notes
- The IEP/ISS was not completed or updated timely or does not contain all the elements.
- Improper documentation used for eligibility determination.
- WIOA Title I Youth were not introduced to the full array of PA CareerLink® services
- Missing supervisory/second-level review of participant eligibility.





Performance

- Failure to meet the adjusted negotiated rate for one measure.
- Failure to meet the adjusted negotiated rate for more than one measure.
- Failure to meet the adjusted negotiated rate for one or more measure(s) for a second, consecutive year.





Technical Assistance Resources

- L&I's System of Record policy
- L&I's Common Identifier policy
- L&I's WIOA Performance Assessment policy
- L&I's Youth Eligibility policy
- L&I's Self-Attestation policy





How to Avoid Findings - Basic Considerations





Avoiding Findings 101

- Ensure regular review of the federal, state, and local statutes, regulations, policies, guidance which govern WIOA activities. This is recommended to be an annual process.
- Phone a friend. Ask colleagues from other LWDBs how they've addressed a similar situation or compliance issue. Some of the best solutions are locally generated.
- Base LWDB compliance on BWDA's monitoring tools. We've given you what we're looking for. Develop these for local use to ensure the compliance basics are covered. Also, monitor early and often.
- Attend touchpoint sessions like the one you're viewing right now.
- Contact your assigned Oversight Analyst or the OS Resource Account (ra-li-bwda-os@pa.gov) and we'll pull the resources needed to respond to technical assistance requests.





Thank you!

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