

Revised 10/27/11

DOL-DET POLICY FOR MONITORING WIA SUBCONTRACTORS

This policy provides guidelines for the monitoring requirements of sub-contractors outlined in the Workforce Investment Act.

Fiscal

1. A desk audit is performed for each sub-contractor on a monthly basis. As a condition of the contract, the sub-contractors are responsible for submitting a monthly financial report. Each financial report is reviewed to ensure compliance within the approved budget.
2. The Internal Auditor II will be responsible for on-site monitoring of a minimum of 33% of all Workforce Investment Act sub-contractors each fiscal year. The selection is based on the following criteria:
 - all new sub-contractors must be reviewed and offered technical assistance during the first year;
 - any sub-contractor who is identified during the monthly desk audit as needing assistance;
 - DET contract manager identifies a concern regarding a specific sub-contractor.
 - Otherwise, the selection of the sample is random, guaranteeing that all subcontractors will be monitored within the three year period of the grant.
3. The Internal Auditor will be responsible for collecting and reviewing all A-133 audits for compliance, internal control and schedule of federal financial assistance. An initial determination must be issued within 60 days of receipt of the A-133 audit. Final determinations are to be issued within 150 days of receipt of audit.

Program

This procedure establishes the standard for on-site contractor visits during the program year.

1. Monitoring:
 - “One Stops – A minimum of one monitoring visit will be conducted for each “one Stop” office.
 - Adults & Youth – A minimum of one monitoring will be conducted. A second monitoring visit will be conducted for all contracts identified at the initial monitoring as having problems. The decision to require a second monitoring visit

to contractors not identified as having problems is at the discretion of the Employment & Training Administrator.

2. File and eligibility reviews (includes the review of the documentation of performance and documentation of eligibility for individuals served during the current contract period and for the data validation review for exiters in the pool for the current Federal reporting period):

Adult Blue Collar, “One Stop” and Youth –

- Open Entry programs will be reviewed a minimum of 2 visits per program year. Reviews will be completed in separate performance quarters.
- Cycle programs will be reviewed at least twice per cycle. The first cycle visit will be at the start of the cycle. The second cycle visit will be a “performance” visit that will take place following the end of the cycle.
- The following establishes the minimum number of files to be reviewed within the contract year:

Enrollments	Minimum # of Files
1-125	20
1-854	50
>854	100

The above guidance is only a minimum and Contract Managers should select more files when time permits and when issues/concerns are found. Files should be randomly selected by the contract manager and the contractor should be notified of the selected files no more than 1 business day before the scheduled on site visit.

3. Other on-site reviews

- On-site reviews will be conducted as needed. In addition to the minimum visits established above, monthly performance validations and other contacts with contractors will be used to identify potential problems. Whenever a potential problem arises that cannot be resolve through telephone/e-mail, an on-site visit will be conducted

Documentation of all on-site visits will be in writing.