



ARRA 2009 Monitoring and Oversight Plan



Monitoring and Oversight

The *American Recovery Reinvestment Act of 2009* has made it clear that every taxpayer dollar spent on our economic recovery must be subject to unprecedented levels of transparency and accountability. Five objectives have been identified, to ensure that:

- Recovery funds are awarded and distributed in a prompt, fair, and reasonable manner;
- The recipients and uses of all recovery funds are transparent to the public, and that the public benefits of these funds are reported clearly, accurately, and in a timely manner;
- Recovery funds are used for authorized purposes and every step is taken to prevent instances of fraud, waste, error, and abuse;
- Projects funded under the recovery legislation avoid unnecessary delays and cost overruns; and,
- Programs meet specific goals and targets, and contribute to improved performance on broad economic indicators.

The **Compliance Division** of the Louisiana Workforce Commission/Office of Workforce Development serves as the monitoring agent for all *WIA* subrecipient grants, including the *American Recovery Reinvestment Act of 2009* whereby conducting auditing/monitoring of fiscal and programmatic requirements. Compliance audits/monitoring are designed to provide reasonable assurance that an entity's program(s) outcomes and fiscal processes/reports conform to Federal/State, statutes and regulations. These reviews will serve as an early warning device, which will address problem areas before they become severe and provide for corrective action plans.

The Compliance Division is evaluating specific program provisions of *WIA* services i.e. *Youth, Adult, Dislocated Worker*, and will incorporate best practices processes to ensure increased oversight, monitoring and compliance with the provisions under the *American Recovery Reinvestment Act of 2009*. Additionally, we will perform a risk analysis of Recovery Act programs in order to determine and identify any high risk programs. Using the aforementioned risk assessments, we will defined strategies, developed with input from the Inspector General for the agency, to prevent or timely detect waste, fraud, or abuse.

The Compliance Division will work with Louisiana Workforce Commission staff to assess current performance evaluation and review processes to include the ability to report periodically on completion status of the program or activity, and program and economic outcomes, consistent with Recovery Act requirements. This will be accomplished by collaboration between the Compliance Division and LWC *WIA* program and field staff to survey summer employment worksites.

In order to achieve these standards the Compliance Division of Louisiana Workforce Commission has assess its current level of personnel to manage existing *WIA* operations. Accordingly, will be investing in human capital, adding additional staff to monitor local programs and *American Recovery Reinvestment Act of 2009s*.

To ensure the seamless delivery of effective and efficient services to LWIA and Business and Career Solutions customers, the State reviews both the operation and management of its Business and Career Solutions Centers and the function of Local Workforce Investment Boards.

There are specific regulations and pronouncements and circulars from the federal government that dictate the scope of the monitoring, and in some cases, how often they are monitored. Monitoring consist of programmatic review, financial review, Internal Controls review, and a review to ensure compliance with the uniform administrative requirements by conducting desk and on-site and monitoring.

Desk monitoring consists of quarterly or annual fiscal, programmatic and/or performance monitoring of *WIA* and/or *Wagner-Peyser* operations.

On-site monitoring consists of quarterly or annual fiscal, programmatic and/or performance monitoring of *WIA* and/or *Wagner-Peyser* operations and a review of how the grantees monitor their sub-recipients.

The analysis of the fiscal, programmatic and/or performance monitoring is developed in accordance with Federal rules and regulations by a team, which includes field staff, monitors, programmatic and fiscal specialists.

The **Management Information Systems (MIS) Division** of the Office of Workforce Development will serve as the monitoring agent for Data Validation of *WIA* and *Wayner-Peyer* subrecipient grants programmatic/performance requirements.

The **Integrated Field Services Division** of the Office of Workforce Development will serve as the monitoring agent for *WIA* and *Wayner-Peyer* subrecipient grants, whereby conducting monitoring of programmatic/performance requirements.

LWIA and Business and Career Solutions Centers are monitored to:

Ensure the Center is operating in compliance with WIA law and regulations;

Ensure the services provided by the Business and Career Solutions centers meet a consistent level of quality across the State; and

Identify best practices, which include policies, procedures, and structures that facilitate service delivery or remove barriers to the receipt of services.

i. WIA

Fiscal Monitoring

The **Compliance Division** will perform fiscal monitoring of selected reports to source documents including reviewing the primary fiscal system and any subsidiary systems used in the preparation of reports. A random sample of invoices is checked to ensure supporting documentation is present, costs are reasonable and allowable and payments are correct and timely.

Reviewing internal controls to ensure they are adequate including separation of duties and an adequate review and approval process.

Reviewing obligational controls to ensure the grantee neither over nor under commits or expends funds in completed during the period reviewed.

Programmatic Monitoring

The **Compliance Division** will perform programmatic monitoring which includes a review of the number of WIA Adults and Dislocated Workers in training, number of WIA Youth enrolled in programs, number of the most at-risk youth served, and whether the local area is meeting the WIA performance measures with the scope of the monitoring review.

A letter is developed for each local director, including areas of effective practice, potential problems and existing problems or concerns. If major problems are identified, a corrective action plan is required. As part of LWC monitoring activities, to ensure that all mandated One-Stop partners have a presence in the One-Stop Delivery System.

Programmatic Monitoring – Data Validation

The **Management Information Systems (MIS) Division** will perform a data validation sample from the prior year is pulled for each local area using the Mathematica Validation Software. Data is validated to ensure local areas are properly documenting services and outcomes. In addition, a sample of current participants is pulled and the same eligibility and services information is validated.

An in-depth review of the operation of the Business and Career Solution Centers will address staffing, customer flow, cost sharing, linkages and referral and level of involvement of the One-Stop partners. In addition a key component is observation of services including those provided at the Business and Career Solutions Centers and a sample of vendors. This observation includes: ensuring that Core services are universally and easily accessible, that customers needing Intensive services receive them in a timely manner and that staff are trained and knowledgeable about the services available through the Business and Career Solutions Centers as well as other community resources.

An Equal Employment Opportunity review is done. The review ensures that policies and procedures have been developed in accordance with EEO requirements. Participant data is reviewed to ensure there are equitable services and outcomes.

Grantee Sub-Recipient Monitoring

The **Compliance Division** will perform reviews of the grantee's sub-recipient monitoring instruments to ensure appropriate fiscal and programmatic areas are monitored. Obtain the list of sub-recipients that were monitored last year and the schedule of sub-recipients to be monitored during the monitoring period. Review a sample of the sub-recipient monitoring reports to include noting any problems identified and corrective actions taken by the local entity.

Reports

The **Compliance Division** will draft monitoring reports and hold exit conference within 30 days of the completion of desk review and on-site visit. Grantee has 15 days to respond to the report.

Issuance of final monitoring report which incorporates or takes into consideration the Grantee response to the draft monitoring report. This is completed within 60 days of the draft report.

Corrective action response within 15 days of receipt of final report, if corrective action is necessary.

Desk or on-site review, whichever is appropriate, to ensure corrective action steps are taken. The timeframe is dependent on the severity of the problem.

ii. WIA and Wagner-Peyser

The **Integrated Field Services Division** will conduct programmatic/performance monitoring which includes a review of new job seekers, services received number of exiters and entered-employment and retention rates for both Wagner-Peyser and Veterans programs.

Programmatic monitoring includes the same in-depth review of Business and Career Solutions Centers as described for WIA entities.

iii. Workforce Investment Board Monitoring and Oversight

Local WIB monitoring and oversight is designed to ensure local boards meet the membership and function requirements of WIA, Section 117. This is done through a biennial board recertification process. It is important that local boards serve as both change agents and drivers of the accountability effort at the local level. In order for the local board to successfully support integration and collaboration, the State must ensure the appropriate stakeholders are represented and the board is fulfilling its mandated role.

During the recertification process, the State Board reviews:

The composition of each local board and adherence to established membership criteria as outlined in Section 117 (b);

The satisfactory performance of required board functions as outlined in Section 117 (d);

The establishment and appropriate composition of a Youth Council or alternative entity, as specified in Section 117 (h), that carries out the required duties; and

The performance of the local area on WIA performance measures.

Local boards are recertified for a two-year period, unless they have failed to meet all established requirements. In such cases, the local WIB must develop an improvement plan to address any deficiencies and receive technical assistance from LWC. The State will monitor the local board's progress and, if satisfactory, will recertify.