

 MARICOPA COUNTY HUMAN SERVICES DEPARTMENT Workforce Development Division	SECTION/REFERENCE 20 CFR Subpart D 667.410	PAGE 1 OF 3
	ORIGINAL ISSUE DATE February 2004	REVISION DATE June 2013
	AUTHORIZED BY: Patricia Wallace, Assistant Director	
SUBJECT: WIA Program Monitoring Policy and Procedures		ADDENDA:

Purpose:

The MWC Youth Program must meet contractual obligations and requirements in accordance to County, State, and Federal regulations and guidelines. Maricopa County Workforce Connections will provide on-going quality assurance reviews to ensure continuous improvement and compliance within its program. Reviews will include administrative and programmatic components related to program efforts/ successes in providing WIA activities, through statewide and local workforce investment systems. This policy addresses monitoring of program, contract compliance, and fiscal review.

Responsibility of:

Quality Assurance unit staff, program supervisor(s), Career Guidance Specialist/contract providers, contracted program counselors, and the Workforce Development Division (WDD) Senior Grants Accountant.

Program Monitoring:

1. **Quality Assurance Reviews** are conducted by the Quality Assurance Team. This process reviews program participant files, desktop reviews, performance compliance, and contractor staff and participants interviews. Additionally, the process may include interviewing worksite supervisors, training providers, and employers. Reviews will be conducted biannually or as needed to include:
 - a. A ten percent file sample will be randomly selected from each Case Managers/Career Guidance Specialists’ caseload to include active and/or follow up files.
 - b. The Quality Assurance Team will use a Quality Assurance File Review Form to document findings/concerns for each of the files that are reviewed. The review form will reflect a percent score for each component of the file that is reviewed.

Note: Sub paragraphs c and d apply to the WIA Youth Program Only.

- c. The review may include interviewing staff and participants to obtain feedback on the quality of customer service and the need of any resources and/or training to improve the effectiveness of service delivery. QA Team may monitor/observe contractor services such as work readiness classes, youth orientation, intake, shadowing case managers, and basic skills training.

d. Work Experience / OJT On-Site Monitoring

The process will include a random sample of worksites that are providing a work experience or on-the-job training to youth participants. On-sites visits will be conducted by the MWC Quality Assurance Team to ensure compliance with the following:

- WIA Public Law and regulations
- Child Labor Laws
- Worksite safety
- Review of Worksite Agreement or OJT contract for consistency with job duties, dates of employment, wages, hours, benefits, and supervisor information
- Review of payroll and time/ attendance records
- Participant's need for support services are being addressed by the contractor
- Ensure that employer is not displacing or laying off workers in the same occupation
- Equal Opportunity Compliance
- Satisfaction level from worksite supervisor and youth participant.

- e. Desktop review may be conducted to address performance issues, timely data entry, and overall program compliance.
- f. The QA Team will compile the findings and scores from each file that was reviewed into a QA Corrective Action Report. In addition the report will include a summary addressing any overall findings/ concerns and best practices, either from the files reviews and/or conducted interviews. Each of the overall findings/ concerns will be followed by program recommendations, per QA Team. Please note that a Corrective Action Report is designed to be assistive, not punitive. Report outcomes such as findings, observations, and recommendation can be addressed through technical assistance, training, and/or recognized best practices.
- g. An electronic copy of the QA Corrective Action Report and the Review Forms will be provided to the Contractor or WIA Program Supervisor.
- h. The Contractor or WIA Program Supervisor will respond to each of the individual findings and the overall issues/ concerns within ten (10) business days of receipt of the electronic copy of the QA Corrective Action Report. Contractor responses to the corrective action report must include a detailed, time-specific plan that addresses the finding(s) and/or appropriate action taken that addresses the report. All responses at a minimum should include how the contractor resolved or will resolve the finding/issue and if applicable what actions were taken to prevent re-occurrence.

If a Contractor/Program Supervisor has been aggrieved by a decision of the MWC, they may appeal the decision. The "variance" section of the Corrective Action Report should be completed and submitted as instructed. The completion of the Corrective Action Report will be placed on hold until the variance is resolved.

Youth Program Contract Monitoring

The MWC Contract Administrator will ensure that all youth providers are contract compliant through the review of:

- Timely submission of reports as required by contract
- Timely submission of invoices as required by contract
- Meet program income reporting requirements
- Timely submission of budget modifications
- MWCs policies/procedures/forms are used per contract
- Ensure MWC EO site visits are conducted as required or needed
- Program monitoring results
- Other contract related activities such as attendance at Youth Council meetings, MWC trainings, youth provider meetings, etc...

The Contract Administrator will provide a compliance status report to the Youth Council and youth contractors throughout the year.