

CITY AND COUNTY OF SAN FRANCISCO  
GAVIN NEWSOM, MAYOR

OFFICE OF ECONOMIC AND  
WORKFORCE DEVELOPMENT  
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# **San Francisco Office of Economic and Workforce Development**

## **FISCAL MONITORING PROCEDURES MANUAL**

**January 2010**

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## I. MONITORING OVERSIGHT PROCEDURES

### PURPOSE:

This manual contains the San Francisco Office of Economic and Workforce Development (OEWD) standards for monitoring and oversight. These procedures are developed to standardize guidelines concerning oversight, evaluation and monitoring.

### REFERENCES:

- **Section 117 (d) (4)** Program oversight --The local board, in partnership with the chief elected official, shall conduct oversight with respect to local programs of youth activities authorized under section 129, local employment and training activities authorized under section 134, and the one-stop delivery system in the local area.
- **Section 117 (h) (4) (B) (ii)** Conducting oversight with respect to the eligible providers of youth activities, in the local area.
- **Section 121 (a) (3)** Conduct oversight with respect to the one-stop delivery system in the local area.
- **Section 123** From funds allocated under paragraph (2)(A) or (3) of section 128(b) to a local area, the local board for such area shall identify eligible providers of youth activities by awarding grants or contracts on a competitive basis, based on the recommendations of the youth council and on the criteria contained in the State plan, to the providers to carry out the activities, and shall conduct oversight with respect to the providers, in the local area.
- **Section 184 (a) (2) (A)** In general --Each State (including the Governor of the State), local area (including the chief elected official for the area), and provider receiving funds under this title shall comply with the applicable uniform cost principles included in the appropriate circulars of the Office of Management and Budget for the type of entity receiving the funds.
- **Section 184 (a) (3) (A)** In general --Each State (including the Governor of the State), local area (including the chief elected official for the area), and provider receiving funds under this title shall comply with the appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving the funds, as promulgated in circulars or rules of the Office of Management and Budget.
- **Section 184 (c) (1) (2) (3)** Accessibility of Reports --Each State, each local board, and each recipient (other than a subrecipient, subgrantee, or contractor of a recipient) receiving funds under this title—
  - (1) Shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary;

- (2) Shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188; and
  - (3) Shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title.
- **Section 184 (f) (1) (2)** Maintenance of Additional Records --Each State and local board shall maintain records with respect to programs and activities carried out under this title that identify—
  - (1) Any income or profits earned, including such income or profits earned by subrecipients; and
  - (2) Any costs incurred (such as stand-in costs) that are otherwise allowable except for funding limitations.
- **20 CFR – 667.400 (c) (1)** Each recipient and subrecipient must continuously monitor grant-supported activities in accordance with the uniform administrative requirements at 29 CFR parts 95 and 97, as applicable, including the applicable cost principles indicated at 29 CFR 97.22(b) or 29 CFR 95.27, for all entities receiving WIA title I funds. For governmental units, the applicable requirements are at 29 CFR part 97. For non-profit organizations, the applicable requirements are at 29 CFR part 95.
- **20 CFR – 667.410 (c) (1) (2) (3)** Roles and responsibilities for all recipients and subrecipients of funds under WIA title I in general. Each recipient and subrecipient must conduct regular oversight and monitoring of its WIA activities and those of its subrecipients and contractors in order to:
  - (1) Determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and the regulations in this part;
  - (2) Determine whether or not there is compliance with other provisions of the Act and the WIA regulations and other applicable laws and regulations; and
  - (3) Provide technical assistance as necessary and appropriate.
- **20 CFR Part 34** -Implementation of the nondiscrimination and equal opportunity requirements of the Workforce Investment Act of 1998 as Amended.
- **Code (CUIC) Section 15032** - it shall be the duty of the Council to: Monitor the performance of the job preparation and training services system to assure its

compliance with the service delivery area plan, and through utilization of performance criteria established pursuant to this division, assess the levels of success achieved by the system. Where the system's performance is not up to standard, the council shall propose modifications which maximize successful outcomes.

## II. PROCEDURES AND METHODOLOGY

A. Desk Review shall consist of, but shall not be limited, to:

- Review contracts, files, documents, and related correspondence;
- Review applicable Federal and State Regulations;
- Review Budget and Expenditure reports;
- Review audits as necessary;
- Review prior monitoring reports.

B. Field Review shall consist of, but shall not be limited, to:

1. Entrance Conference - A description of the scope and purpose of the monitoring, including programs to be reviewed and determination that information required to complete monitoring visit is available at the site.

(Note: The Service Provider shall receive a current listing of all participants in the client data system prior to the review.)

2. Conduct interviews:

- With staff involved with the WIA contract activity;
- Program participants at training sites;
- Arrange exit interview.

3. A review of:

- a. Fiscal and program records for compliance with WIA contract and generally accepted accounting principles.
- b. Review pay records (time cards/sheets) and attendance reports to ensure controls are established for preventing unauthorized payments.
- c. Review (OJT, internship, work experience, etc.) contracts/agreements between training site (employer) and the Service Provider to ensure that training is being provided and payments are appropriate. Contracts shall be reviewed for dates, authorized signatures, amount paid, and supporting documents to justify payment.
- d. Review staffing levels, operating procedures, and contracts to determine Service Provider capability to fulfill contract obligations.
- e. Review Service Provider records on expenditures of WIA contract funds and supporting documents.

C. The following areas will be reviewed:

3. EEO/Grievance Procedures

- Grievance Procedures
- Personnel policies
- Job Descriptions for Staff

4. Procurement Practices (OEWD Property and Training Services Procurement Procedures)

- a. Adherence to contract requirements and instruction for purchases
- b. Documentation of contract awards
- c. Procedures for prevention of conflict of interest
- d. Political Activities Prohibited
- e. Property Management

5. Financial Management

- a. Standards for financial management systems.
- b. Fiscal controls and accountability.
- c. Record retention.
- d. Allowability of costs.
- e. Classification of Costs.
- f. fiscal Records
  - Cash Receipts Journal
  - Cash Disbursement Journal
  - Payroll Journal
  - General Ledger
  - Bank Reconciliation
  - Accounts Payable Journal
  - Purchase Journal
  - Cost Allocation Plan
- g. Source Documents, such as:
  - Time Sheets - staff and participants
  - Vendor invoices
  - Travel reimbursements
  - Petty cash
  - Canceled checks
  - Advances (Review of cash-on-hand.)

7. Supportive Service Payments

Need documented in the participant Service Plan.

8. Participant wages and fringe benefits

Requirements for allowable payments to WIA participants.

9. Record Keeping

Require that records be retained for 3 years after submission of final expenditure report for that funding period.

10. Prevention of Fraud and Abuse

The State Workforce Investment Division Policy describes the procedures for reporting any violations.

If during the monitoring process the monitor suspects that he/she has discovered possible fraud/abuse, monitoring of the Service Provider will be terminated and findings reported immediately to his/her immediate Supervisor and the OEWD Director. The OEWD Director will then make the necessary contact with the Provider and the Chair of the WIB.

11. Property Control Records

- OEWD property is tagged and used for WIA purposes
- Buildings and facilities rental funded with contract funds is being used for project proposes and is adequate/inadequate
- Verification of prior approval, where applicable
- Conduct a random check to determine if proper care and attention is being given to the maintenance, repair, and protection of OEWD property

D. Exit Interview will be held with appropriate staff of the Service Provider when the monitoring visit is completed. Problem areas will be discussed in general terms; in addition, the monitor will provide information about observations of procedures, processes and programs which may be cited for replication.

E. Monitoring Report - A monitoring report shall be written as a result of the desk review, field review, participant interviews, and other related activities. The report will state the objectives, scope and methodology of the monitoring; and will clearly state findings, recommendations, and whether corrective action is required. Findings will contain a statement of criteria (Regulation, Directive, or Contract Clause), the condition found, the cause of the problem, and the effect or consequence that will result if corrective action is not taken.

This report will be written and submitted to OEWD Administration for circulation and comment. A draft transmittal letter and/or the report of findings will be issued to the Service Provider within 30 days of the exit conference. When corrective action is recommended to resolve a finding or address a concern a letter will be issued to the service provider and provide fifteen (15) working days from issuance for response. Resolution of corrective action shall be sought until all issues are concluded. A copy of the report and correspondence will be filed in the master contract file at the OEWD.

If during the monitoring process the monitor suspects that he/she has discovered possible fraud/abuse, monitoring of the Service Provider will be terminated and findings reported immediately to the OEWD Director. The OEWD Director will then make the necessary contact with the State and the Workforce Investment Board. The OEWD Director shall make a determination regarding submission of an Incident Report to the State EDD.

### **III. PROCEDURE FOR CLOSING A MONITORING REPORT**

1. If the service provider response to the monitoring report is deemed sufficient or corrective action has taken place, a closure letter will be initiated by OEWD. Where appropriate findings shall remain open pending monitoring follow-up.
2. Should the service provider response be inadequate, OEWD will direct the corrective action in writing. The service provider will have five (5) working days to file a written appeal, provide further information, or request an extension.

3. If corrective action was implemented within 30 days of the closure letter, validation of corrective action taken will be made and documented through follow-up monitoring.

#### IV. GENERAL SERVICE PROVIDER INFORMATION

Service Provider Name: \_\_\_\_\_

Funding: \_\_\_\_\_

Amount: \_\_\_\_\_

Date of Review: \_\_\_\_\_

Monitor: \_\_\_\_\_

Type of Contractor: ( ) private-for-profit  
( ) private non-profit  
( ) public  
( ) other \_\_\_\_\_

|                   |              |
|-------------------|--------------|
| Interviewee _____ | Title: _____ |
| Interviewee _____ | Title: _____ |
| Interviewee _____ | Title: _____ |

##### A. Management Systems

1. Is there a procedure for referral of clients to other services/training where appropriate, and if so how? (yes\_\_\_) (no\_\_\_) (Are clients referred back to the One-Stop for possible re-evaluation when services are not provided by the Service Provider?)

\_\_\_\_\_

\_\_\_\_\_

2. Has the following been distributed or made accessible to staff:

\_\_\_\_\_ Directives or information from OEWD

\_\_\_\_\_ Current WIA regulation and laws

\_\_\_\_\_ Personnel Policies

\_\_\_\_\_ Grievance Procedures

\_\_\_\_\_

\_\_\_\_\_

##### B. Fraud and Abuse

1. What procedure(s) does the Service Provider follow to provide identification and reporting of fraud and abuse?

\_\_\_\_\_

\_\_\_\_\_

## V. FINANCIAL ACCOUNTING AND INTERNAL CONTROLS

29 CFR Parts 95 and 97 require recipients and subrecipients to maintain fiscal accountability of grant funds. Render an opinion as to the adequacy of the entity's financial management system and verify that the system includes but is not limited to:

- Written fiscal procedures,
- A system of internal controls, and
- Documentation of receipts and disbursements.

### A. General Information

1. Is the Service Provider current on audit work. Yes\_\_\_\_\_ No\_\_\_\_\_

If no, explain:\_\_\_\_\_

Date of most recent audit:\_\_\_\_\_

Obtain a copy of their most recent audit.

2. Indirect cost rate used: \_\_\_\_\_% Approved by Cognizant Agency?  
( ) yes ( ) no If yes, obtain a copy of the approved rate.

3. Does the Service Provider's financial manual(s) adequately describe financial procedures in the following areas and is coverage up-to-date?

Yes\_\_\_ No\_\_\_bonding/insurance

Yes\_\_\_ No\_\_\_audit requirements

Yes\_\_\_ No\_\_\_payroll – staff

Yes\_\_\_ No\_\_\_payroll-participants

Yes\_\_\_ No\_\_\_ITA refunds

Yes\_\_\_ No\_\_\_advances/ reimbursements

Yes\_\_\_ No\_\_\_petty cash

Yes\_\_\_ No\_\_\_purchasing procedures

Yes\_\_\_ No\_\_\_bank reconciliation

Yes\_\_\_ No\_\_\_allowable costs

Yes\_\_\_ No\_\_\_chart of accounts

Yes\_\_\_ No\_\_\_cost allocation

Yes\_\_\_ No\_\_\_posting to books of account

Yes\_\_\_ No\_\_\_reconciliation's between subsidiary and official records

Yes\_\_\_ No\_\_\_internal control procedures and requirements for cash controls

Yes\_\_\_ No\_\_\_responsibility for recording transactions & approving transactions

Yes\_\_\_ No\_\_\_complaints and grievances

Yes\_\_\_ No\_\_\_incident reports

Yes\_\_\_ No\_\_\_property management

**Note:** If the Service Provider's audit has reviewed any of the above procedures and rendered an unqualified opinion, note the auditor's approval and review the remaining documents.

5. How many bank accounts are there with deposits of WIA funds? \_\_\_\_\_  
How many are: zero balance \_\_\_\_\_ clearing accounts \_\_\_\_\_  
payroll accounts \_\_\_\_\_ other \_\_\_\_\_

6. What were the findings of the last audit? What corrective action was taken?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. How long are financial records retained? \_\_\_\_\_ years

8. Complete the worksheet at the end of this chapter describing Separation of Duties.

**B. Follow-up Issues**

Date of previous monitoring \_\_\_\_\_

After reviewing previous fiscal monitoring reports and documents relating to corrective actions, note areas that require special attention:

\_\_\_\_\_  
\_\_\_\_\_

Specific questions to review with the Service Provider:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**C. Audit Trail**

**All payments made to contractors require invoicing to include all source documentation. Reimbursements are only made for transactions that are documented and determined allowable on the invoice.**

**D. Bank Reconciliation**

Examine the bank statements and bank reconciliations for the review period to determine if proper reconciliations were done. Copies should be made of the review period documents as needed. Form an opinion on the timeliness and accuracy of the reconciliation process taking into consideration the following:

- The frequency of bank reconciliations (within two weeks of receipt of bank statement) to the general ledger;
- The reconciliation worksheets are signed and dated;

- The timeframe when outstanding payroll and vendor checks are written off;
- That canceled checks (including voided checks) are itemized and are actually compared to the disbursement journal for date, amount, and payee (If canceled checks are not provided by the bank, the canceled check register is compared to the disbursement journal); and
- That there is a separation of duties between the individual who records disbursements and receipts, signs checks, and reconciles the disbursement and receipts journals.
- That costs are reported on an accrual basis.

For an accounting system maintained on a cash basis, review worksheets for the last reporting period that show the adjustments made to obtain accrued figures in the general ledger and determine the following:

- Accruals are supported by the general ledger,
- The worksheet(s) agree with the report for that period,
- Accrued leave obligations are included in the computations,
- Proper adjustments were made.

#### E. Program Income

29 CFR 95.24, 29 CFR 97.25, and 20 CFR 667.200(a)(5), (6), and (7) of the WIA regulations define program income for the purposes of this grant. Identify program income as defined in the above regulations and determine if it has been accounted for and expended in accordance with those requirements.

**Note:** 20 CFR 667.200(a)(5) of the WIA regulations authorizes the addition of program income to funds already obligated under the grant after the cost of generating the income is deducted, provided this cost is not charged to the WIA program.

In rendering an opinion on this process consider the following:

Does the Service Provider receive any income (interest, profit, etc.) from WIA programs?  
How are these funds handled and what controls ensure the proper use of income?

- interest from bank account?
- "profit"?
- other?

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- Program income as defined by the regulations is reported in the Service Provider's books of account and on reports to OEWD
- Program income is expended for allowable purposes under the contract under which it was earned.
- All income generated under fee-for-service activity is reported as program income.
- Interest income is all interest earned on WIA deposits.

- Program income is identified and accounted for in program activities that generate income.
- Revenue in excess of costs in contracts with nonprofit or governmental entities is recorded as program income.
- Program income funds are liquidated before additional funds are requested for operation of the program.

**F. Space Use**

1. Does the Service Provider ( ) rent or ( ) own the building(s) used to house WIA activities? List all addresses for both administrative and training operations connected with all WIA programs.

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2. If the building is owned by the Service Provider, how is the organization compensated for use of its building(s) and how was this amount determined?

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Do you have documentation which supports the amount charged? ( ) yes ( ) no  
If no, explain.

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**G. Salary and Bonus Limitations**

Do salaries and bonuses of contractor executives for WIA programs exceed the 2007 \$177,000 limit under Public Law 109-234?  Yes  No If YES, please identify the LWIA executive(s) and the amount exceeded:

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1. If the salaries and bonuses of any contractor executive exceed the \$168,000 limit, what actions has the contractor taken to address the excess?  N/A or describe actions:

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References: WIA Directive WIAD06-18 Adjusted Salary and Bonuses Limitations for 2007  
DOL Training and Employment Guidance Letter 5-06

**H. Cash Management**

**ALL OEWD SERVICE PROVIDERS ARE ON A REIMBURSEMENT BASIS. NO CASH IS RECEIVED IN ADVANCE OF EXPENDITURE.**

## Separation of Duties

Enter names of staff who have responsibilities at top. Place checkmark below name if person has responsibility for that function.

|                               |  |  |  |  |  |  |  |  |  |  |
|-------------------------------|--|--|--|--|--|--|--|--|--|--|
| Function                      |  |  |  |  |  |  |  |  |  |  |
| Approves Purchase orders      |  |  |  |  |  |  |  |  |  |  |
| Verifies receipt of order     |  |  |  |  |  |  |  |  |  |  |
| Prepares request for funds    |  |  |  |  |  |  |  |  |  |  |
| Authorizes disbursement       |  |  |  |  |  |  |  |  |  |  |
| Prepares checks               |  |  |  |  |  |  |  |  |  |  |
| Signs checks                  |  |  |  |  |  |  |  |  |  |  |
| Custodian of blank checks     |  |  |  |  |  |  |  |  |  |  |
| Compares checks with vouchers |  |  |  |  |  |  |  |  |  |  |
| Distributes checks            |  |  |  |  |  |  |  |  |  |  |
| Posts disbursements           |  |  |  |  |  |  |  |  |  |  |
| Receives checks               |  |  |  |  |  |  |  |  |  |  |
| Post receipts                 |  |  |  |  |  |  |  |  |  |  |
| Deposits receipts             |  |  |  |  |  |  |  |  |  |  |
| Custodian of petty cash       |  |  |  |  |  |  |  |  |  |  |
| Petty cash replenishment      |  |  |  |  |  |  |  |  |  |  |
| Bank reconciliation           |  |  |  |  |  |  |  |  |  |  |
| Maintains general ledger      |  |  |  |  |  |  |  |  |  |  |
| Prepares financial report     |  |  |  |  |  |  |  |  |  |  |
| Approves financial report     |  |  |  |  |  |  |  |  |  |  |

## VI. COST ALLOCATION

This section is to be completed whether or not the Service Provider receives only WIA funds or funds from any other sources in addition to the WIA funds being reviewed. Attach a copy of:

- a. The descriptive cost allocation plan (the written methodology used to establish expenditure allocation percentages)
- b. The Service Provider's projected % allocations for all sources including the current year WIA contract(s).

The information may be presented in the Service Provider's current format if the information cannot be converted to the worksheet at the end of this chapter or you may use the copy of the attached format. Information from documents submitted will be cross-checked for accuracy during the on-site review by examining your current year journal entries.

Written cost allocation plan available: ( ) yes ( ) no If no, explain

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Current year projected allocation worksheet available ( ) yes ( ) no If no, explain

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1. Approximately what percentage of the LWIA's income comes from WIA funds?  
 \_\_\_%

List all other funding sources:

| Fund Source                         | Amount      |
|-------------------------------------|-------------|
| _____                               | _____       |
| _____                               | _____       |
| _____                               | _____       |
| _____                               | _____       |
| _____                               | _____       |
| _____                               | _____       |
| _____                               | _____       |
| <u>Total of all funding sources</u> | <u>100%</u> |

2. What is the basis of allocating the above salaries and benefits?

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3. What is the basis for allocating use of space and utilities?

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4. What is the basis for allocating supplies and other routine expenses?

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Based on the information obtained, render an opinion addressing the following:

- The number of fund sources the entity receives
- The method(s) used to allocate staff salaries and benefits
- The method(s) used to allocate operating costs
- Whether or not the bases for allocation are allowable and reasonable
- Whether or not bases are consistent for similar types of costs

### VERIFICATION OF COST ALLOCATION

This worksheet is to verify whether direct costs were disbursed according to the cost allocation plan.

**Columns 1 and 2:** Select up to 12 that were allocated among projects and list them by check number (columns 1 and 2).

**Column 3:** Enter the amount (%) to be allocated to WIA according to the cost allocation plan, or in its absence, the claimed proration policy.

**Column 4:** Verify that the amount charged to WIA is consistent with that scheduled (planned)

| Check Number<br>(1) | Payee/Purpose<br>(2) | Allocation       |               |
|---------------------|----------------------|------------------|---------------|
|                     |                      | Scheduled<br>(3) | Actual<br>(4) |
| 1                   |                      |                  |               |
| 2                   |                      |                  |               |
| 3                   |                      |                  |               |
| 4                   |                      |                  |               |
| 5                   |                      |                  |               |
| 6                   |                      |                  |               |
| 7                   |                      |                  |               |

|           |  |  |  |  |
|-----------|--|--|--|--|
| <b>8</b>  |  |  |  |  |
| <b>9</b>  |  |  |  |  |
| <b>10</b> |  |  |  |  |
| <b>11</b> |  |  |  |  |
| <b>12</b> |  |  |  |  |

## **VII. PROPERTY MANAGEMENT**

The requirements for use, management, and disposal of grant-purchased equipment for nonprofit and commercial organizations are found at 29 CFR 95.34 and for local government agencies at 29 CFR 97.32(c) through (e). In instances where a State is a subrecipient, 29 CFR 97.32(b) requires that it use, manage, and dispose of grant-purchased equipment in accordance with its own laws and procedures. Obtain a copy of those procedures and determine if the State is following the process as prescribed.

Equipment for the purpose of this review is defined as tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit or any more restrictive definition imposed by the awarding agency.

Render an opinion based on those requirements. The opinion should address the following:

- Equipment is clearly marked and inventoried by funding source.
- There are written procedures which contain:
  - Requirements for the conduct of a physical inventory every two years
  - Methods for sale or disposition of equipment
  - Maintenance
  - Requirements to account for the status of property at closeout

The equipment inventory contains at a minimum the following information:

- Description of equipment
- Location and use
- Serial number
- Purchase price and date
- Percentage of Federal participation in the purchase
- Title
- Acquisition date
- Condition
- Control system for loss, theft, or damage
- Disposal date and sale price, if applicable

## **VIII. ON-THE JOB TRAINING**

This instrument is used to collect information for determining whether a service provider contracted to arrange and supervise OJT contracts complies with the terms of the contract and is providing quality training to participants.

## PRIMARY CONCERNS

- Adequacy of contracts for ensuring quality of training and compliance with WIA requirements

Conditions required for contract payments:

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Date and amount of last invoice or payment: \_\_\_\_\_ \$ \_\_\_\_\_

### A. Adequacy of the OJT Contract

1. Who is responsible for reviewing and approving OJT contracts before they are submitted for signatures? How do you assure that each contract contains the stipulations and provisions mandated by OEWD?

This question examines the process by which OJT contracts are written. It is advisable that at least one person other than the signatory parties review the contract for compliance to LWIA policies and requirements. Are there checks and balances to assure that OJT contracts meet uniform requirements?

### 2. Contract Review

If the broker is responsible for developing or supervising the OJT contracts, it is necessary to review the contracts for their compliance to OEWD policies, WIA requirements and cost limitations. Review a sample of 50 percent of the contracts using Worksheets (OJT Matrix). Summarize the results below by indicating the percent of contracts reviewed that met the following requirements:

\_\_\_\_\_ Identifies reporting and payment procedures in contract

\_\_\_\_\_ Sets out beginning and ending dates of the contract

\_\_\_\_\_ Provides for signatures of participant, employer and OEWD prior to beginning date of contract

\_\_\_\_\_ Reimbursement rates to the employer is no more than 50 percent as documented by employer payment records

\_\_\_\_\_ Contains standard general provisions required by OEWD and State for adherence to all WIA provisions as they relate to OJT contracts

## **B. Checklist for Standard Provisions**

Note if any of the following standard provisions are absent or there is some question about the adequacy of the provision. Add any other provisions required by the OEWD or State for OJT contracts. Advise the administrative entity if provisions are missing or inadequate.

- Trainees will be covered by Workers' Compensation, or, if not applicable, alternative equivalent. {667.274 (b) (1)}
- Displacement of currently employed workers or infringement of promotional opportunities is prohibited. {667.270 (a)}
- Contains provisions that cover liability, sanctions & debt repayments {668.630}
- Records must be retained by the contractor, including time and attendance and payroll records.
- Contains provision regarding contract modification, handling of disputes and termination, including termination for the convenience of the government.
- Provides for maintenance, retention and access to pertinent records by staff from OEWD, State and U.S. Department of Labor. {667.270 (c)}
- Training will be in accordance with laws and regulations governing safety and health standards applicable to the worksite. {667.274}
- Describe employer's commitment to retain participant(s) at the end of training.
- Requires contractor comply with all applicable business licensing, taxation, and insurance requirements.
- Contains provision for nondiscrimination and prohibition against sectarian activities. {667.275}
- Contains provision for union concurrence/comment if appropriate.
- Provides compensation of the participant at the highest of the Federal, State and local minimum wage or the prevailing wage rate of similarly situated employees.

## **C. Oversight**

Does the Provider monitor each OJT contract at least once during the period of performance?

As to see a schedule for conducting the oversight.

Does the Provider have a standard monitoring tool to conduct oversight?

## **IX. EXIT INTERVIEW CHECKLIST**

Date Exit Interview Completed \_\_\_\_\_

Itemize findings and recommendations

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