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San Francisco Office of Economic and Workforce Development

MONITORING PROCEDURES MANUAL

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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 Management Information Systems data, including current enrollment and placement results;
 - 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.
 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 systems for controlling program administration, including those for determination of participant eligibility where applicable (Youth programs only.).
 - c. Review pay records (time cards/sheets) and attendance reports to ensure controls are established for preventing unauthorized payments.
 - d. Interview participants to determine training meets guidelines approved by OEWD.
 - e. 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.
 - f. Review staffing levels, operating procedures, and contracts to determine Service Provider capability to fulfill contract obligations.
 - g. Review Service Provider records on expenditures of WIA contract funds and supporting documents.
 - h. Review affirmative action plans as applicable.
- C. The following areas will be reviewed:

1. Participant Eligibility Process

Ensure that the Service Provider's eligibility systems are in compliance as required by WIA Eligibility Determination and Verification Directives currently in effect.

2. Participant Assessment and Individual Service Strategy

- a. Development of Assessment Report
 - Long Term, Short Term Goals
 - Results of Assessment
 - Assessment Recommendations
- b. Development of Service Strategy
 - Periodic review and update of Service Strategy
 - Review of participant progress.
 - Review of quality and success of training.
- c. Participant Files
 - Registration Form and eligibility support documentation
 - Client Action/Enrollment Forms
 - Civil Rights Form, signed by participant and dated
 - Job Performance Evaluation/Assessment
 - Individual Service Strategy (ISS)
 - Termination/ Placement documents
 - Documentation of competencies (youth and adults)
 - Case Notes
 - ITA Agreements
 - Supportive Services

3. EEO/Grievance Procedures

- Grievance Procedures
- Personnel policies
- Affirmative Action Plan, current
- Job Descriptions for Staff
- EEO Poster, display and location

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. Maintenance of Effort.

Prohibition regarding the displacement of currently employed workers.

6. 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. Consistency of program activities and services

Work performed is consistent with activities stated in the Contract and Statement of Work.

11. 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.

12. 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

13. Insurance Policies

Worker's Compensation, General Liability, Fidelity Bond

- C. 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.
- D. 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: _____

Address: _____

Contract No. _____

Funding Source and 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. Has the following been distributed or made accessible to staff:

- _____ Directives or information from OEWD
- _____ Current WIA regulation and laws
- _____ Personnel Policies
- _____ Grievance Procedures

Conclusion

B. Complaints and Grievances

Does the provider have a complaints procedures that complies with OEWD requirements? _____

Have any complaints or grievances been filed within the report period? _____

Are there any complaints outstanding from the prior period? _____

What is the status of each complaint?

Complainant	Status
_____	_____
_____	_____

C. Fraud and Abuse

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

Conclusion:

V. REGISTRATION AND CERTIFICATION

A. Desk Review

1. Review Individual Service Strategy (ISS) guidance
2. Eligibility Verification Determination System
4. Coordination with MIS/OEWD Intake and Service Providers
5. MIS Reports (Registration Form, and other client transaction information)
6. Review other forms used in the Intake process

B. Field Review

1. Interview with Management staff--entrance conference
2. Review operations and files
 - a. Review ISS
 - b. Review client assessment
 - c. Review referrals
 - d. Eligibility - multiple barriers
 - e. Outreach and recruitment services provided
 - f. Review documents used to determine client eligibility and testing instruments used for assessment.

C. Staff Interviews

1. How does the Service Provider ensure that target groups identified in the contract are being served at the levels indicated? (This question is applicable to Service Providers that conduct their own intake, refer to the contract for service levels.)

2. 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?)

3. What process is used by the Service Provider or OEWD to purge out-dated client files? Are client records maintained for at least three (3) years?

4. How does the Service Provider ensure that intake staff is familiar with current OEWD eligibility requirements? (Does the staff have adequate reference material readily available?)

5. Are files easily accessible but safeguarded? (yes___) (no___)

6. Are intake staff familiar with participant selection criteria? Does staff appear to be knowledgeable of client eligibility, assessment, testing and referral as it relates to training and other community services?

Was this confirmed in the file review? (yes___) (no___)

7. How does the Service Provider ensure that relatives by blood, adoption, or marriage of any executive or employee of do not receive favorable treatment for enrollment in services?

8. When applicants are interviewed at intake, how are they informed about:

- | | | | | |
|----|---|-----------|------------|----------|
| a. | Rights & benefits
of participants | Verbal___ | Written___ | Other___ |
| b. | Grievance
procedures | Verbal___ | Written___ | Other___ |
| c. | WIA programs
& training expectations | Verbal___ | Written___ | Other___ |

Was the material reviewed in an orientation? (yes___) (no___) How?

9. Based on your observation do you feel that Service Provider staff is qualified to conduct the assessment? (yes___) (no___)

10. Who interprets the test results? Does the same staff that administers the test, read the results?

11. How are the test's results then used? (Are the results used in developing the ISS?)

12. Is in-service training provided to the assessment staff? (yes___) (no___) (n/a___) (Are staff adequately trained and provided with current information?)

13. If yes, when and what type of training was provided?

14. Is the assessment process adequate to provide for a thorough ISS development? (yes___) (no___) (n/a___) If no, explain:

Conclusion

VI. ASSESSMENT

Number to be Served: Plan: _____ Actual: _____

Types of assessments to be provided:

- () basic education
- () aptitude
- () vocational interests
- () physical fitness
- () work/life styles
- () general intelligence
- () work simulations
- () other _____

Assessment instruments to be used:

Duration of assessment and referral process:

Assessment reports to be provided:

Who is responsible for identifying participants needing supportive services?

- () One-Stop
- () this contractor
- () another contractor

The following questions may be directed to more than one of the contractor's staff since there are a variety of subjects covered. Explain the purpose of the interview and quickly review the subjects to be covered.

Interviewee's Name

Title

_____	_____
_____	_____
_____	_____

A. Program Overview

1. Describe briefly how the assessment and referral activities are organized? How do applicants get into assessment?

The purpose of this question is to obtain a general orientation to the assessment and referral component. What is the sequence of events or activities? Is there any screening, other than for eligibility that occurs before participants reach assessment? Summarize the response below.

2. Where do the assessment and referral activities take place? Where are participant records kept?

Response to this question locates where data sources are and identifies logistic, of the activity.

3. How many clients have been served thus far? How have they been distributed in terms of the referral options?

This question establishes how large or active the assessment component is and whether it is achieving planned objectives. Is there a wide variance in where participants are being referred or does it appear that most participants are being directed to the same activity? To what extent is the timing of available slots determining choice of referrals?

4. What were the factors that determined the approach used to assess participants and make referrals?

The purpose of this question is to determine how rational the reasoning is behind the choice of assessment tools and procedures. Are these decisions driven by the selection criteria of the referral options? What were the assumptions made about participants' general

capabilities and interests? How does the assessment process fit into the development of an individual service strategy (ISS)?

5. List the assessment techniques used and indicate what percent of the participants served received assessment.

The purpose of this question is to establish how often assessment tools and procedures are applied and what accounts for any variation in what type of assessment is given participants. Are assessment techniques varied to accommodate participants with different characteristics? Assessment techniques include interviews, paper and pencil tests, questionnaires, and any other process that is designed to obtain information from the participant relative to employment planning.

Technique	Objective	Type of Participant Youth/Adults)
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

6. What kinds of qualifications must staff have to administer or interpret the results of the assessment tools described above?

Some assessment instruments, particularly projective tests, require special training or a post-graduate degree in psychometrics. At a minimum, staff that administer or interpret tests must be trained on the specifics of a particular instrument. What are the education levels and specialties of the staff charged with administering and interpreting tests? What kinds of training are they given? Keep in mind that administering tests is generally easier than interpreting tests and requires less qualified staff.

7. How does the Service Provider assure that any tests used are appropriate for participants?

Are written questionnaires (forms) or tests used without first checking to verify that the participant is literate in English? What effort was made to investigate the validity and reliability of the tests? What authoritative source is used to support the validity and reliability of the tests for the culture represented by the target group?

8. How does the information collected through the assessment tools listed above relate to the referral options and services available?

The purpose of this question is to establish that there is a direct link between the assessment activities described thus far and information needed to make referral decisions. Is the information generated by the assessment relevant to the kinds of decisions that must be made? Make sure that each assessment product can be justified by a need for the information.

CONCLUSION

Are the assessments tailored to the individual differences of participants or does everyone get the same assessment? Is the information generated by the assessment useful for employment planning in that it is relevant to the referral options open to participants? Do you generally feel that the assessment activities described above can be justified in terms of the usefulness of the information for employment planning?

B. Quality of Individual Service Strategy

1. What written records or documents demonstrate how it is determined that participants have an interest or compatibility for the occupation and/ or training reflected in their Individual Service Strategy Plan (ISS).

The purpose of this question is to establish that the assessment data supports the participants' referral to a particular training or service strategy. Answering this question may require some reference to several participant files. Look for indication in the documents or interviewee's response that participants' interests and capabilities were considered in developing the ISS. Is there a connection between assessments results, past work history, or vocational interest in work related to the training occupation? Is the ISS specific and reflective of individual differences or do they all read much the same?

2. What role does the participant play in developing the ISS? What feedback do participants receive from assessment results?

What procedures and methods are used to help participants select training and employment services? Is the participant active in the employment planning process? Are they given sufficient information to make informed decisions about their job training? This would require information about entrance criteria for various training options, information about job requirements, salaries and benefits, etc. Are ISS's signed by the participant?

3. Who does the testing, counseling, ISS development, and referrals?

If different individuals are involved, how are their efforts coordinated? To what extent is a counselor involved in employment planning?

CONCLUSION

C. Outcomes and Participant Benefits

1. How many participants have received, training, employment planning and referral services thus far? What other services, other than assessment, have they received?

Briefly, summarize services received by participants.

2. Of those participants referred to training, education, or work experience, what percent completed the activity successfully?

The Service Provider may have to conduct some type of follow-up to get this information. The purpose of this question is to determine the attrition rate for Service Provider referrals. Participants poorly matched to training service frequently dropout or are unable to perform at a level to be successful. Since the best evidence of a good referral system is the success of the participants, this is an important question. Percent: _____%

CONCLUSION

Does it appear that the Service Provider is in compliance with the terms of the contract? What observations support or refute the above information?

D. Participant Interviews

Participants (or applicants) should be interviewed individually unless they were assessed as a group, an unlikely occurrence. Select participants who have been assessed and referred and are sufficiently into their ISS to have some opinion about the relevance of the employment plan and objectives to their needs, interests, and capabilities. You will need a copy of the interviewee's ISS and, if possible, a summary of the test results, or other assessment data to compare. Note: This interview may be accomplished during other points of your monitoring visits where Participant contact is made.

INTERVIEWEES:

1. Recall your experience when you were interviewed and counseled regarding your training or employment goals. What sort of tests did you take? How long did it take before you completed the process and were referred to training?

Have the participant describe the activities and events leading up to his/her referral. How do they compare to the procedures described by the contractor?

2. Do you think that the tests measured your abilities? If not, why not? Were you surprised at the test results?

Look for examples of test anxiety that may depress test scores, statements suggesting that participants' test scores are much different from grade level achieved or other evidence that the tests are not good measures of ability. How clear is the participant about the results of any tests taken?

3. Do you think that the staff (use name if possible) has a good understanding of your background, interests, and capabilities?

Does the participant have confidence in the kinds of information obtained about his/her vocational interests and aptitudes? Did the staff take enough time or did the participant feel rushed through the process? Look for how much individual attention was given the participant.

4. How well are you doing in the class (or job)? How close is this to the objective set out in your ISS or training plan?

Probe for information regarding the success of the participant in the training situation or job. Does it appear that the assessment and subsequent counseling resulted in a good or poor match between the participant and the labor market? If not successful, can the problem be related to failure of the participant to possess essential qualities needed for the job, e.g., basic education, physical requirements, interest, etc.?

5. What would you like to see changed about the procedures leading to your employment plan and referral to training? Why?

Look here for factors relating to the inconvenience and time required as well as the procedures themselves. Do participants have any special reaction to the staff involved? How comfortable were they throughout the process? Do they generally find it a helpful process or just another bureaucratic hoop to jump through?

CONCLUSION

Are the assessments tailored to the individual differences of participants or does everyone get the same assessment? Is the information generated by the assessment useful for employment planning in that it is relevant to the referral options open to participants? Do you generally feel that the assessment activities described above can be justified in terms of the usefulness of the information for employment planning?

E. Records Review

Complete record review sheets for a 10 percent sample of participants. If a review of this sample reveals inadequate recordkeeping, increase the sample to 20 percent. Summarize below the percentage that:

- _____ Documents period of participation
- _____ Documents activities
- _____ Records all services received, date service received
- _____ contains complete ISS
- _____ ISS is signed by participant
- _____ Contains follow-up information
- _____ Shows assessment of basic education
- _____ Shows assessment of interests
- _____ Shows assessment of work history
- _____ Shows assessment of vocational aptitudes
- _____ Shows assessment of general intelligence
- _____ Shows assessment of life style preferences
- _____ Shows assessment of physical fitness
- _____ Shows assessment of supportive service needs
- _____ Shows ISS implemented
- _____ Shows ISS objectives achieved

Note any discrepancies between participant records, observations, and interviewee responses. Ask for assistance from contractor staff in reconciling discrepancies. Do the participant records show that assessment and the employment planning process results in good referrals? If the ISS is not implemented or the objectives not realized, what explanation do the staff have?

CONCLUSION

VII. FINANCIAL ACCOUNTING AND INTERNAL CONTROLS

29 CFR Parts 95 and 97 require recipients and sub recipients 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:_____

2. Does the Service Provider have an approved indirect cost rate?

Indirect cost rate used: _____% Cognizant Agency_____

If yes, obtain a copy of the approved rate.

3. Obtain a copy of the Service Provider's current organizational chart indicating both the titles and names of all individuals employed by the agency whether or not they are currently working on WIA contracts. If the organization chart does not list the Board of Director's names, obtain a separate listing of current names and titles.

4. 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___ payroll

Yes___ No___ ITA refunds

Yes___ No___ purchasing procedures

Yes___ No___ bank reconciliation

Yes___ No___ chart of accounts

Yes___ No___ posting to books of account

Yes___ No___ reconciliations between subsidiary and official records

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? _____
Is there cash on hand in any of those accounts? _____

All contractors are on a reimbursement basis. If there is cash on hand, ask the Provider

for an explanation of where the funds were generated.

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 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

Complete the following by tracing a sample of transactions (not less than 10) from the disbursement journal or record of expenditures. These should be dated within the period being reviewed.

The selections should be made to determine if: proper approvals were obtained; the recorded amounts are accurate; adequate original support documentation exists; the cost was allowable; the cost was correctly allocated (to each WIA or non-WIA program or activity); and the cost was classified appropriately. As this analysis is not intended to be representative, select entries that seem more likely to be questionable (e.g., large expenditures, cash transactions, etc.).

Select entries from the disbursement journal and examine supporting documentation for each selected entry. Select significant or unique entries for tracing. Each disbursement should contain information indicating the purpose of the expenditure. Ensure the following:

- Original requisitions and invoices should be present in addition to any statement summarizing several purchases.
- The appropriate individual should have given approval for the disbursement.
- Invoices/statement of authorization forms should have check numbers entered to indicate that payment has been made.
- If a direct cost, cost classification should be entered on the invoice, statement, or authorization form.

Note: Credit card statements should have original receipts. Purpose, allowability, and cost category should be determined for each item on the statement.

Perform the same review for at least 10 ITA payments. In this case, determine if the amount claimed by the vendor is the amount paid, and determine whether any refunds should have been made based on the agreement with the training institution (e.g. refund if student drops within first week.)

If there is significant activity in the petty cash account, review the process and determine the following:

- How are funds disbursed, and what approval is required.
- How petty cash is secured and how often random surprise audits are conducted.

Form an opinion on the sufficiency of the audit trail for WIA transactions, taking into consideration the following:

- All transactions are traceable to canceled checks or electric fund transfers.
- There were no discrepancies between the check amount or date and the journal entry.
- All transactions appear to be necessary, reasonable, allocable, and allowable to the WIA program.
- Adequate documentation (original invoices vs. statements) supports all transactions.
- Check numbers and dates of payment were entered on all original source documents, invoices or statements to indicate that payment was made.
- All checks contained proper and prior authorization by an authorized signatory of the Service Provider.
- The cost classification and/or general ledger number (identifying program and cost category) was entered on all invoices (or equivalent back up).
- All refunds were recovered, where applicable, for ITA payments to vendors.
- The process by which the entity is notified that a refund is due from the vendor; and
- How that information is conveyed to the fiscal unit.
- The numerical sequence of checks in the disbursement journal is complete and there are no check numbers missing including voided checks.
- No checks are made out to cash.
- Postings to the disbursement journal and general ledger are reasonably up to date (within one week of date of disbursement and within one month to posting into the general ledger).
- For manually maintained records, the books of original entry are in ink (and corrected by lining out the amount and inserting the correct amount).
- For automated or computer generated media, edit checks can be performed only by authorized individuals.

CONCLUSION

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.

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.

After having conducted all of the above tests, form a conclusion regarding the overall fiscal system and processes of the entity. The system should sufficiently address the following:

- Adequate audit trails for all disbursements;
- Disbursements documented properly to support costs as allowable, allocable, reasonable, and necessary;
- Disbursements made by check or electronic fund transfer only, except for petty cash;
- All disbursements are recorded accurately; and
- Internal controls were established and followed.

CONCLUSION

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?

- 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.

CONCLUSION

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.

2. If space is rented, who owns the building(s)? Attach copy of lease(s) to this questionnaire.

Is there any type of relationship between the landlord(s) and anyone on the Service Provider's management/board, WIB staff, OEWD staff or management/board?

3. 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?

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

G. 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 that 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							

VIII. 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

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

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. How often does the Service Provider review and update its cost allocation plan?

3. What is the basis of allocating the salaries and benefits of staff who work on several fund sources?

How do you know if this proration is reasonably accurate?

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

5. What is the basis for allocating travel, supplies, and other routine expenses?

Based on the information obtained and the number of fund sources, form an opinion addressing the following:

- 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

CONCLUSION

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 (1)	Payee/Purpose (2)	Allocation	
		Scheduled (3)	Actual (4)
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			

IX. ONE-STOP RESOURCE SHARING

The WIA regulations at 20 CFR 662.300(b) require the partners in a One-Stop system to maintain a written agreement (Memorandum of Understanding (MOU)), which includes a description of the shared costs of the One-Stop center. Conduct a review of the arrangements made by the One-Stop operator to ensure that all partners are bearing their fair share and the following areas are addressed:

- A written agreement (MOU) signed by the partners exists as to how common costs will be shared in the operation of the center.
- The agreement covers all shared costs such as:
 - Space
 - Administrative staff
 - Utilities
 - Program staff
 - Office supplies
 - Postage
 - Office equipment
 - Other.

Note: Shared costs may be addressed in resource sharing documents other than the MOU.

- The method used to determine that each partner's "fair share" contribution is equitable.
Note: The reviewer should consult the *Federal Register* dated May 31, 2001 (*Resource Sharing for Workforce Investment Act One-Stop Centers*) when making this determination.
- The bases used for allocating different types of costs are reasonable and reviewed periodically to ensure their accuracy and applicability.

Test charges made for shared costs and offer an opinion as to whether or not the costs are being distributed in accordance with the partners' agreement.

CONCLUSION

X. FUNDING LIMITATIONS

1. How does the Service Provider ensure that contract limitations are not exceeded?

2. What is the Service Provider's understanding of steps to follow if the contract funding limits will be exceeded?

CONCLUSION

XI. REVIEW OF ORIGINAL SOURCE DOCUMENTS FOR DISBURSEMENTS AND

RECEIPTS

1. Using the worksheet at the end of this chapter entitled "Accounting Records", select and trace a sample of transactions from the disbursement journal or record of expenditures. These should be dated within the three-month period being reviewed.

The selections are made to determine if: proper approvals were obtained; the recorded amounts are accurate; adequate original support documentation exists; the cost was allowable and the cost was correctly allocated (to each WIA or non-WIA program or activity). Since this analysis is not intended to be representative, select entries that seem more likely to be questionable. For example, routine payments to vendors such as the landlord, utilities, etc., might be omitted. During the desk review **and/or** the source document review, make copies of any questionable transactions to attach to the worksheet and annotate the reasons the item was questioned and any response made by the accountant or bookkeeper concerning the item.

2. Using the worksheet entitled "Accounting Records By Vendor" complete an examination of selected vendors from the vendor file. If documents are filed within vendor folders, it permits a more efficient and rapid examination of transactions, especially with respect to whether they were reasonable and necessary. Select vendors on the basis of increased probability of questionable transactions as identified in the desk review (e.g., unusually high or one time purchases, spending overages in certain budget line items, etc.). In selecting files, ask the accountant or bookkeeper about the vendors and what they provide to the contractor. During the desk review and/or the source document review, make copies of any questionable transactions to attach to the worksheet and annotate the reasons the item was questioned and any response made by the accountant or bookkeeper concerning the item.

Answers the following based on the worksheets and provide an explanation where appropriate:

- Y N ? Were **all** transactions traceable to canceled checks?
- Y N ? Were there **any** discrepancies between the check amount or date and the journal entry?
- Y N ? Did **any** transactions appear to be unnecessary, unreasonable or not allowable?
- Y N ? Did **adequate** documentation (**original invoices** vs. statements) support **all** transactions?
- Y N ? Were payments made within the discount period **and** discounts taken?
- Y N ? Were the check numbers and dates of payment entered on **all** original source documents, invoices or statements to indicate that payment was made?
- Y N ? Was there **proper and prior** authorization by an authorized signatory of the Service Provider?
- Y N ? Was the cost classification and/or G/L # (identifying program and cost category) entered on **all** invoices (or equivalent back up)?
3. Examine the numerical sequence of checks in the disbursement journal to determine if any check number is missing.

Period for which check numbers will be examined: _____

Check Numbers of missing entries _____ Or none ()

If there is a missing entry, ask for an explanation. Check subsequent bank statements to see if the checks cleared.

4. Look at the data entry dates in the disbursement journal and general ledger for the review period.

What are the dates of the last posting during the review period?

To the disbursement journal:_____ To the general ledger:_____

Y N ? Are postings reasonably up to date (within one week of date of disbursement and within one month to posting into the general ledger)?

Y N ? Are books of original entry in ink (and corrected by lining out the amount and inserting the correct amount) or on computer generated media (that cannot be revised or changed except via initiating a correcting journal entry)?

Y N ? Are corrections made by white out or erasure (unacceptable) or by revising original computer entries (unacceptable)?

5. Compare the list of payments from WIA to the contractor's entries in their cash receipts journal, using Worksheet 4 completed during the Desk Review.

Y N ? Are the two records always consistent in dollar amounts and deposits made within reasonable period? Inquire about apparent differences in amounts or dates.

6. Review a sample of actual canceled checks and make copies as necessary:

Period for which checks will be examined: _____

Sequence of numbered checks reviewed: # _____ through # _____

Y N ? Are any missing the required number of authorized signatures?

Y N ? Are voided checks included? (If not, how are they stored?)

Y N ? If checks are arranged in numerical order, are any checks missing? (If so, find out where they are).

Y N ? Are any checks made out to Cash? List or copy all checks made out to Cash. Use this information for a review of petty cash disbursements posted to the G/L.

Y N ? Do any endorsements appear unusual, e.g., more than one endorsement, or any authorized signatures that appear different?

7. After comparing checks made out to Cash to the petty cash items in the disbursement journal, note any unmatched items. Record an explanation for each check not used for the petty cash fund.

8. Follow up to determine if voided checks were actually traced and filed so that all checks in the series picked for review can be readily accounted for.

9. Ask the person who reconciles the bank statement about the procedures used to verify that the balance is consistent with ledgers. This should include:

_____Frequency of bank reconciliation's (within two weeks of receipt of bank statement)

_____How long-outstanding payroll and vendor checks are handled (written off after what period)

_____How bank transfers (if done) are handled

_____That canceled checks (including voided checks) are actually compared to the disbursement journal for date, amount, and payee

_____That the recording of disbursements and receipts by _____ and the signing of checks by _____
is done by a person other than the reconciler: by _____

10. Examine the bank statements and bank reconciliations for the review period to determine if proper reconciliations were done. Make copies of the review period documents as needed.

Date of the last review period reconciliation: _____

Y N ? Were outstanding checks itemized?

Y N ? Does it appear that the statement was reconciled with the general ledger?

Y N ? Does the reconciler sign and date the statement or worksheets?

Y N ? Were the reconciliations done by an employee who was not responsible for recording receipts or disbursements or signing the actual checks?

11. If the Service Provider receives advances from OEWD, examine a sample of bank statements for the past 6-12 months.

Y N ? Were there transfers between accounts? (If so, ask for documentation to support the transfer and determine if this procedure was necessary.)

Y N ? Did the bank pay interest on the balance? (If reimbursement is required, ask for canceled checks showing reimbursement.)

12. If accounting is done on a cash basis, ask to see the worksheets for the last reporting period which show the adjustments made to obtain accrued figures in the General Ledger report.

Y N ? Does the worksheet agree with the report for that period?

Y N ? Are accrued leave obligations included in the accrued computations?

Y N ? Does it appear that the proper adjustments were made?

CONCLUSION

Are there adequate audit trails for all disbursements?

Are disbursements documented properly to support costs as allowable, allocable, reasonable and necessary?

Are disbursements made by check only, except for petty cash?

Are all disbursements recorded accurately?

Were internal controls followed?

Are there any discrepancies between this record review and other information obtained either during the interviews or the desk review? Clarify any discrepancies at this time.

Source Document Review:

Specific questions to review with the Service Provider:

INSTRUCTIONS FOR ACCOUNTING RECORDS WORKSHEET

Select entries from the disbursement journal and examine supporting documentation for each selected entry. Enter the following information:

From disbursement journal:

Enter basic data as indicated

From canceled checks:

- Check? Enter check mark if present
- Accuracy? Enter check mark if amount, date and vendor name correspond

From the support documentation:

- Purpose Enter stated purpose or "not indicated" or "not clear" as appropriate
- Allowable Enter check mark if expenditure is allowable, a question mark (?) if not or if questionable
- Invoice? Enter a check mark if an **original** invoice is present; this should be in addition to any statement summarizing several purchases
- Adequate? Enter check mark if the invoice is adequate (quantity, description and unit

cost shown? amount the same?)

Authorized? Enter a check mark if there is a proper signature giving approval for the disbursement

Check #? Enter a check mark if the invoice/statement of authorization form has the check number entered to indicate that payment was made

NOTE: Credit card statements should have original receipts as well. Purpose, allowability, and cost category should be determined for **each** item on statement.

ACCOUNTING RECORDS

From Disbursement Journal	From Canceled Checks	From Supporting Documentation	Comments
---------------------------	----------------------	-------------------------------	----------

Vendor	Check #	\$ Amount	Date	Check?	Accuracy?	Purpose	Allowable?	Invoice?	Adequate?	Authorized?	Check #?	Comments
1.												
2.												
3.												
4.												
5.												
6.												
7.												
8.												
9.												
10.												

XII. 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

CONCLUSION

XIII. YOUTH PROGRAMS

A. Eligibility for Youth Services

1. How is youth eligibility determined and documented?

2. Does this process document that the youth is:

- (a) Age 14 through 21;
- (b) A low income individual, as defined in the WIA section 101(25); and
- (c) Within one or more of the following categories:

- (1) Deficient in basic literacy skills;
- (2) School dropout;
- (3) Homeless, runaway, or foster child;
- (4) Pregnant or parenting;
- (5) Offender; or
- (6) Is an individual (including a youth with a disability) who requires additional assistance to complete an educational program, or to secure and hold employment. (WIA sec. 101(13).)

yes no

3. Definitions and eligibility documentation requirements regarding the "deficient in basic literacy skills" criterion in Sec. 664.200(c)(1) are established and the program operator is aware of them. yes no.

4. If yes, does this criterion include a determination that an individual:

- a. Computes or solves problems, reads, writes, or speaks English at or below the 8th grade level on a generally accepted standardized test or a comparable score on a criterion-referenced test; or
- b. Is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family or in society. (WIA secs. 101(19), 203(12).)

5. Is the "requires additional assistance to complete an educational program, or to secure and hold employment" criterion in Sec. 664.200(c)(6) defined and documented? yes no

6. Are all youth participants registered? Yes No ?

7. What is the local program's definition of economically disadvantaged?

8. Are any youth participants not economically disadvantaged Yes () No ()?
If yes, are they documented as:
- a. School dropout;
 - b. Basic skills deficient, as defined in WIA section 101(4);
 - c. Are one or more grade levels below the grade level appropriate to the individual's age;
 - f. Pregnant or parenting;
 - e. Having one or more disabilities, including learning disabilities;
 - f. Homeless or runaway;
 - g. Offender; or
 - h. Facing serious barriers to employment as identified by the Local Board. (WIA sec. 129(c)(5).)
9. Are at least 30 percent of youth funds used to provide activities to out-of-school youth yes () no ()?
- Total youth expenditures \$ _____
 Expenditures for out-of-school youth \$ _____
 Percent expenditures for out-of-school youth _____ %
10. Is there documentation that youth participants were provided an objective assessment that meets the requirements of WIA section 129(c)(1)(A), and includes a review of the academic and occupational skill levels, as well as the service needs, of each youth yes () no ()?
11. Is there evidence of an individual service strategy for each youth participant that meets the requirements of WIA section 129(c) (1)(B), including identifying an age-appropriate career goal and consideration of the assessment results for each youth yes () no ()?
12. Dose the youth participant's case file document preparation for postsecondary educational opportunities, provide linkages between academic and occupational learning, provide preparation for employment, and provide effective connections to intermediary organizations that provide strong links to the job market and employers yes () no ()?

CONCLUSION

B. Work Experience

Work experiences are planned, structured learning experiences that take place in a workplace for a limited period of time. As provided in WIA section 129(c)(2)(D) and Sec. 664.470, work experiences may be paid or unpaid.

1. Is there evidence that work experience sites comply with the Americans with Disabilities Act yes () no ()?
2. Is On-the-Job Training used as work experience yes () no () ?

3. If On-the-Job Training is used as work experience is the service strategy based on the needs identified by the objective assessment of an individual youth participant yes () no () ?

4. Is there a statement from the work site that work experience activities do not displace or reduce the hours available to current workers? yes () no () ?

5. How, and how often, are youth evaluated to determine their progress in work experience activities?

a. Where is this documented (ISS, case record, etc.)?

b. Does the evaluation express an opinion about the appropriateness of continuing the activity yes () no () ?

6. Are youth working more than 20 hours a week during the school year? (yes___) (no___)

(Sample) (Review appropriate records to insure that child labor laws are being adhered to as appropriate)

7. What processes are used by the Service Provider to select Work Experience/Internship training sites in public agencies (or private sector for internship only)? (Review worksite agreements to insure that they are properly executed

8. When conducting Internship, is a written agreement developed between the Service Provider and the employer? (yes___) (no___)

If yes, does the contract:

- ___ Have a task orientated training plan;
- ___ Have a training outline or job description;
- ___ List the number of participants;
- ___ Contain a requirement to hire upon completion; and
- ___ Contain a non-performance termination clause?

CONCLUSION

XIV. YOUTH PROGRAM ACTIVITY

Work experience ()
Internship ()

The following questions may be directed to more than one of the Service Provider staff since there are a variety of subjects covered. Upon introducing yourself to the representative, explain the purpose of the interview and quickly review the subjects to be covered. The representative can then determine who the appropriate respondents are and arrange for their availability. This can be done by telephone prior to the site visit. Also note that some of the information called for in this interview may be available in the contract or other records available to you. If so, complete these sections prior to the interview and use the interview to confirm and clarify those points. Note to Monitor: Indicate if this is a work experience site or internship and use only the appropriate portions of this checklist.

Interviewee's Name

Title

_____	_____
_____	_____
_____	_____

A. Program Overview

1. What is the general purpose of work experience? Describe briefly your approach to developing positions and matching them to participants. How do you view your progress in developing the number and type of worksites set out in the contract?

The purpose of this question is to obtain a general orientation to the Service Providers operations and to assure that the understanding obtained from the desk review is accurate. What are the criteria used to approve worksites? Summarize the response below.

2. Where are participant, worksite and contract records kept? Is there a written worksite agreement that can be reviewed?

This question assumes that the Service Provider responsible for developing and supervising worksites. Response to this question locates where data sources are and identifies logistical problems around completing the monitoring visit in the event that some of the required data is maintained offsite. If there are work site agreements, ask for a copy to determine how much information can be secured from these documents.

3. What is the objective of the work experience/internship?

Is it intended that this teach good work habits to participants with no prior work history? Correct poor work habits identified earlier? Teach specific job skills? Provide for career exploration? Is work experience or Internship linked to other training activities managed by this or another service provider? Is WE/Internship the primary activity in the ISS or does it complement concurrent activities?

CONCLUSION

Review the information in this section. You should have a clear picture of the organization and activities of the WE/Internship's Service Provider in terms of number of work sites, general approach, key staff involved, and WE's role in the participant's overall ISS development.

B. Appropriateness of Work Experience or Internship

1. Describe how participants are recruited for work experience/internship.

If the Service Provider is responsible for recruiting WE/IS participants, how is it determined that they are WIA eligible? Are there any criteria for entering WE/IS activity other than the eligibility criteria?

2. Please demonstrate through written records or documents how it is determined that the WE/IS slots are suitable for participants. How are participant assessment data used to match participants to particular WE/IS positions?

Whether the Service Provider is responsible for recruitment or not, there should be some evidence in their records that supports the participant's referral to a particular WE slot. Answering this question may require some reference to participant files or other documents. Look for indication in the documents or interviewee's response that the work sites are selected with participant employability needs in mind. What kinds of assessment data support the referral to WE? Describe this process of reviewing work sites prior to the assignment of participants.

CONCLUSION

Is there sufficient reason to believe that work experience or Internship is appropriate for the participants from the information above? If not, do you require additional information? Statements to the effect that WE or Internship meets financial needs or that particular work sites are assigned because they are accessible to the participant does not satisfy the requirement that the work sites address employability objectives of the participant.

C. Process Indicators of Quality of Training

1. Are there learning objectives stated for WE/Internship? Are they measurable?

Learning objectives should be stated in behavioral specific terms, e.g., 90 percent attendance and 100 percent on-time, and be readily measurable, particularly as they relate to work habits. Is the employer well acquainted with the learning objectives? Are they in writing?

2. How do participants learn how well they are doing on the job?

Feedback is critical to learning and may take the form of work evaluations, comments by the supervisor, peer evaluations, or practice where they must perform a task to a set standard. Identify the form of feedback used.

3. How do you determine when the WE/Internship objectives have been achieved? Is the assignment open-ended or for a set period? Do supervisors hesitate to “graduate” successful participants?

The purpose of this question is to determine if WE/Internship is directly related to employability objectives and is therefore ended when those objectives are obtained.

4. How do you assure that the worksite supports the employability plan? What form of worksite feedback is used to determine that the participant is progressing toward the employment objectives? How many participants have achieved their training objectives or employment?

Recognizing that employers may object to disruption of work for the purpose of monitoring the training and may be unwilling to expend much energy completing written evaluations, the contractor must demonstrate, nevertheless, methods for assuring that the terms of the contract are being met. Probe especially for how the quality of training is assured and performance benchmarks are achieved.

5. How do you determine that working conditions meet the standards and requirements for WIA WE/IS worksites?

This question is directed to the issue of work site compliance with the State and federal safety laws, child labor laws, political, sectarian and maintenance of effort provisions. How does the contractor orientate the employer to these requirements? Note that if participants are less than 16, special work site requirements are imposed by the State.

CONCLUSION

D. Accuracy of Time and Attendance Records

1. How do you assure the accuracy of participant attendance and time records that support the payroll?

This question is concerned with the procedures used to track and record participant attendance at the work site. Do both the work site supervisor and participant sign the time sheet? How often are time sheets collected? What is the length of the pay periods? Do participants punch a time clock?

2. If the Service Provider is responsible for participant payroll, how do you ensure that wages do not exceed the limits set by the contract?

Because wages are paid on an hourly attendance basis, participant attendance controls the payrolls. How does the contractor monitor participant attendance so that budgeted participant wages are consumed but not exceeded?

CONCLUSION

E. Work Site Supervisor Interview

Worksites must comply with various administrative requirements in addition to providing an appropriate experience for participants. An interview accomplished while the participant is on-site provides opportunity to observe the training experience and the working conditions while obtaining the work site supervisor's perceptions of the purpose of WE. The work site supervisor should be the person who directly supervises the participants and is most responsible for their learning experience.

Work Site _____

Interviewee's Name

Title

1. How long have you functioned as a worksite supervisor for trainees? How long have you supervised this participant?

This question establishes the supervisor's experience and familiarity with the participant now under his or her supervision. Is the most qualified employee serving as the work site supervisor?

2. How does (do) the participant(s) fit in with the work done here?

The purpose of this question is to determine if the participant is compatible with the work environment in terms of both basic skill requirements and personal attributes. Probe for how the participant's appearance, social skills, attention to detail, basic education level and personality match the work site.

3. What are the participant's duties?

Probe for specific responsibilities, kinds of equipment used, products expected and level of difficulty represented by each. If you are unfamiliar with the nature of the job done by the participant, ask these questions of the supervisor. How much responsibility does the participant have?

4. How is the participant's attendance tracked? What records of the participant's attendance are maintained?

This question checks on the accuracy of the attendance records that support wages paid the participant. Are they complete and verified by the supervisor and the participant? How does the supervisor check attendance? Does the work site supervisor's response corroborate information given by the contractor?

5. Are you familiar with requirements for WIA work experience sites? (I.E., Child Labor Laws) (yes___) (no___) How did you become familiar with them?

CONCLUSION

How would you judge the value of this work site in achieving the stated employability objectives for the participants? What are its strengths and weaknesses in terms of number of participants it can serve, type of learning objectives it can achieve types of participants it can serve, accessibility to participants, attractiveness of the work environment, and quality of the supervision? In terms of your observations, how effective do you think this supervisor is with disadvantaged participants? How would you characterize the supervisor's relationship with the participant's paternalistic, officious, friend, and peer? Does the information obtained from this interview comply with the contract statement of work?

F. Participant Interviews

Participants may be interviewed individually or as a group if they share the same work site. If

interviewed as a group, it is important that no one individual dominate the discussion and that the participants not feel that they or their supervisor are being investigated. Use the following questions to learn the participants' perception of their work experience. Begin the interview with introductions, recording their names below. Use respondent initials to attribute significant responses to a particular individual, particularly if the information requires some additional follow-up.

INTERVIEWEES:

1. How long have you been at this worksite?

This question establishes the respondent's experience with the work site.

2. Is attendance recorded every day?

This question confirms whether necessary records of attendance are made.

3. What happens if you are late?

The purpose of this question is to determine if being on time, an important work related behavior, is being reinforced by the work site. Probe to learn if the work site supervisor's response is similar to that of an employer of a regular employee.

4. What happens if you miss time at work?

Are good work related behaviors being reinforced? Can lost time be made up? Are attendance requirements understood by the participants and enforced by the contractor?

5. Do you think that you get enough attention from your supervisor?

Do the participants think that they get enough job coaching and help from their supervisor? If not, what do they think accounts for that? Too many participants or other people to supervise?

6. Do you ever feel that you are wasting your time? When?

The purpose of this question is to determine the participants' perceptions about the usefulness of the work experience. Probe for why they may think their time is being wasted. Are such

feelings associated with a particular area of the training?

CONCLUSION

To what extent does the information from the participant interviews confirm or refute information from other sources? Where there appears to be discrepancies, restate the question or probe more thoroughly to assure that there is no confusion. Note areas of disagreement with other data sources for further investigation.

G. Participant Records

Complete Participant Record Review forms for a sample of 10 percent of the trainees covered by this contract. If evidence of poor record keeping is found, increase the sample to 30 percent. Summarize below the percentage that:

- _____ Document period of participation
- _____ Document attendance in the form of signed time sheets
- _____ Document contacts and communications with participants
- _____ Document progress in completing WE objectives
- _____ Contain information which substantiates appropriateness of work experience
- _____ Contain information regarding reason for termination of work experience
- _____ Document wages and benefits received and position as an employee of the employer of record
- _____ Contain work permits for participants under 16 years of age

CONCLUSION

Are participant records orderly and complete? Is there any reason why they cannot be easily reviewed? Note any observations that confirm or refute information obtained from other sources. Try to reconcile any disparities with information contained in the participant records and information obtained from interviews. Note any discrepancies below.

Complete the following worksite checklist by reviewing a sample of 30 percent of work site records, but no fewer than 10 worksites. Complete a separate form for each work site. List on the form in the first column the name of the work site supervisor, the number of participants supervised, and the occupations represented. Under the column A "Time Documented", check if time sheets or some other form of documentation of attendance at the work site is in evidence. Also check the next two

columns if starting and ending dates for each of the participants assigned to the work site are recorded.

The column, "Work Site Standards" refers to indications that the work site complies with all applicable laws governing WIA work sites. Check this column if the standards are in force or note which ones are not in force.

"Work Permit" column should be checked if the work site or contractor has on file work permits for any youth assigned to the work site.

WORK SITE CHECK LIST

Work Site Supervisor	Number of Participants	Occupations	Time Documented	Date		Work Site Standards	Work Permit
				Start	End		
1.							
2.							
3.							
4.							
5.							
6.							
7.							
8.							
9.							
10.							
11.							
12.							
13.							
14.							

XV. TRAINING SERVICES

A. Classroom Training

1. To what extent are participants taking advantage of PELL grants or other forms of financial support from sources, i.e., non-WIA funds.

The purpose of this question is to assure that there is coordination between PELL grants and other financial assistance, e.g., employer contributions, UIB benefits, so that duplicate payments are avoided. If PELL grants are involved, who assists the participant make application? How are PELL distributions handled i.e. does it go to the school, the participant, or LWIA explain below.

2. Please demonstrate through written records (ISS) or documents how it is determined that participants have an interest or compatibility.

Answering this question will require reference to participant files. Look for indication in the ISS or interviewee's response that participants either asked for this type of vocational training or reflected in their past work history or vocational assessment an interest in work related to the training occupation.

3. What are the entrance criteria for this course?

Entrance criteria are established to assure that trainees have the skills needed to achieve the training objectives within the time constraints imposed on the course. Indicate whether the criteria are in writing, and are relevant to either the training approach used or the occupation.

4. How was it determined that the participants met the above criteria?

Look for information that shows that participants have the requisite skills needed to benefit from the training. Were requisite skills measured through the use of tests, participant self-reports, or participant case histories?

5. What are the employment and vocational training backgrounds of the participants enrolled in this class?

The primary purpose of this question is to ensure that the participants are not already trained in this occupation and, in fact, need the training provided in this contract. Look for any evidence that the training duplicates previous training or pre-existing knowledge and skills.

6. How is basic education coordinated with vocational training?

If basic education or any type of remediation is included in the training, it should be well coordinated with the occupational training. Is the education taught in the context of the occupation? Are links between the basic education instruction and the occupation readily apparent?

7. What evidence is there that completion of this course will lead to employment in a training related job and at the wages proposed in the contract? What types of jobs are being obtained?

Outcomes in the form of unsubsidized employment are the chief benefit expected from the training. Evidence that this is probable may be past experience (or current placements if the class is far enough along), commitments from employers, or job market data.

B. Participant Interviews

Use the following questions to learn the participants' perception of their training experience

INTERVIEWEES:

1. How long have you been in training? Did you have this training or some similar course before?

This question establishes the respondent's experience with the course and any prior training and confirms the extent to which the class is fully operational.

2. How did you get into the course?

This question verifies the institution's statements regarding how appropriateness of the training was determined. Look for confirmation that participants were interested and were involved in the decision to enroll in the training.

3. How do you know how well you are doing?

Do participants seem to know where they stand as far as class standards for acceptable progress? How is this feedback provided?

4. What happens if you fail a test or have trouble with the class work?

The purpose of this question is to confirm how slower students are accommodated in the training and whether the first signs of difficulty are responded to in some constructive way. How do the participants feel about the response given to slower students?

5. Is attendance recorded every day?

This question confirms whether necessary records of attendance are made.

6. What happens if you are late?

The purpose of this question is to determine if being on time, an important work related behavior, is being reinforced by the classroom training. Probe to learn if the instructor's response to lateness reinforces good work habits.

7. What happens if you miss class time?

As in question F, are good work related behaviors being reinforced? How is lost time made up so that progress in the class is maintained? Are attendance requirements understood by the participants and enforced by the instructor?

8. Who do you go to when you have a problem? What generally happens?

To what extent do participants have access to assistance when they have problems. Do they know the name of their classroom counselor?

C. Participant Records

Complete records review sheets for a sample of participants or a minimum of 10 records. If a

review of this sample reveals inadequate record keeping, double the sample. Summarize below the percentage that:

- _____ Document period of participation
- _____ Document attendance
- _____ Document all contacts and communications with participants
- _____ Document progress in completing training
- _____ Record all services received, date service received
- _____ Contain information substantiating appropriateness of training
- _____ Contain information regarding reason for termination of training
- _____ If placement services included, shows name and address of employer, position assumed, hourly and weekly wage, and date of employment

CONCLUSION

Note any observations that confirm or refute information obtained from other sources. Try to reconcile any disparities with information contained in the participant records and information obtained from interviews. Note any discrepancies below.

CLASSROOM TRAINING (ITAS)

Number of Files: _____

Files Reviewed: _____

Percent Reviewed: _____

NAME and SSN	Enrolled – Y/N	ITA Contract	Child Care Y/N	ISS (Goals Appropriate - Y/N	Curriculum Training Plan Y/N	Release of Information Y/N	Case Notes /Progress Y/N	Curriculum Evaluation Y/N	Notice of Completion Y/N	Termination Code/Date	COMMENTS
1.											
2.											
3.											
4.											
5.											
6.											
7.											
8.											
9.											
10.											

XVI. 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

- Appropriateness of training for participants
- Adequacy of OJT follow-up contacts to ensure compliance to contract provisions and participant support
- Training outcomes and other benefits to participants
- Adequacy of contracts for ensuring quality of training and compliance with WIA requirements

CONTRACTOR IDENTIFYING DATA

Name: _____

Address: _____

Contract Number _____

Contractor Representative: _____

Date On-Site Visit: _____

DESK REVIEW QUESTIONNAIRE

Type of Contractor: () Private non-profit () Public

Contract Amount: _____ Number to be served: _____

Number OJT Slots: _____ Number OJT Contracts: _____

Services Provided in addition to OJT:

- () participant recruitment and eligibility
- () assessment
- () vocational counseling
- () OJT placement
- () OJT contract development
- () employer reimbursements
- () contract supervision
- () on-going participant case management

() other _____

Who is responsible for referring participants to the training? () One Stop
() this Service Provider
() another contractor

Planned performance benchmarks for period being monitored: _____

Period: _____

Number enrolled: _____ Number completing training: _____

Number employed/hired: _____ Other: _____

Other contract requirements:

Conditions required for contract payments:

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

Previously monitored: _____

Deficiencies cited:

Outstanding corrective action and timetable:

Results of corrective action:

The following questions may be directed to more than one of the Service Provider staff since there are a variety of subjects covered. Upon introducing yourself to the representative, explain the purpose of the interview and quickly review the subjects to be covered. The representative can then determine whom the appropriate respondents are and arrange for their availability. This can be done by telephone prior to the site visit. Also note that some of the information called for in this interview may be available in the contract or other records available to you. If so, complete these sections prior to the interview and use the interview to confirm and clarify those points.

Interviewee's Name

Title

A. Program Overview

1. Describe your approach to developing OJT positions and matching them to participants. How do you view your progress in achieving contract performance goals?

The purpose of this question is to obtain a general orientation to the contract's operations and to assure that the understanding obtained from the desk review is accurate.

2. How many participants have been served in this or previous brokering contracts and what were the placement results?

This question seeks information about the contractor's past track record. Look for differences between the current and the past contracts' trainees, employers or approach that might account for differences in outcomes. Has the Service Provider demonstrated a capability in either serving a similar target group or in developing effective OJT contracts with similar employers?

3. Where are participant and contract (employer) records kept?

This question assumes that the contractor is responsible for developing and supervising employer OJT contracts.

4. Who are the staff that develop the OJT sites? Are they the same personnel who refer the participants and develop and supervise the contract?

This question identifies the key actors so that when they are referenced in subsequent discussions, you are clear about their roles relative to the services provided and the administration of the contract.

CONCLUSION

Review the information in this section. You should have a clear picture of the organization and activities of the contractor in terms of its size, general approach, key staff involved, and past track record. Reconcile any discrepancies in the information given in the interview and the information gathered during the desk review.

B. Appropriateness of Training

1. Describe how participants are recruited for OJT.

If the service provider is responsible for recruiting OJT participants, how is it determined that they are WIA eligible? Are there any criteria for entering OJT activity other than the eligibility criteria? What is the primary source of referrals to OJT? LWIA? Other vendors? Employers?

2. Demonstrate through written records or documents how it is determined that the OJT slots are suitable for participants? Describe how participants are matched to particular OJT positions.

Whether the Service Provider is responsible for recruitment or not, there should be some evidence in their records that supports the trainees' referral to a particular OJT slot. Look for indication in document or interviewee's response that participants either asked for vocational training or reflected in their past work history or vocational assessment an interest in work related to the OJT occupation. What role do employers play in selecting participants for a particular slot?

3. What are the employment and vocational training backgrounds of the participants enrolled in OJT?

The primary purpose of this question is to ensure that the participants are not already trained in this occupation and, in fact, need the training provided in this contract. Look for any evidence that the training duplicates previous training or pre-existing knowledge and skills.

CONCLUSION

Is there sufficient reason to believe that the OJT training is appropriate for the participants from the information above?

C. Adequacy of Follow-up and Contract Supervision

1. How often is the employer site visited and what services are offered to participants during

these occasions?

This question is aimed at the quality and frequency of contracts between the broker's staff, the employer and the participant. How often is the employer site visited? Is the participant contacted by telephone or in person? Are other services available to the participant in the form of counseling for work adjustment, remedial education etc.? How would you characterize the nature of the interactions between the broker and the participant once the OJT begins?

2. If a participant quits or has difficulties, how do you know about it and how do you become involved?

This question gets at the methods by which the broker mediates problems arising between the participant and the employer. What options are available to the contractor when a participant quits or is having difficulties?

3. How does the service provider assure that the terms of the contract are met?

Recognize that employers may object to disruption of work for the purpose of monitoring the training and may be unwilling to expend much energy completing written evaluations; the broker must demonstrate, nevertheless, methods for assuring that the terms of the OJT contract are being met. Probe especially for how the quality of training is assured.

4. How do you determine that working conditions meet the standards and requirements for WIA OJT requirements?

This question is directed to the issue of employer compliance with the various WIA requirements for OJT contracts. How does the broker orient the employer to these requirements?

CONCLUSION

Does the broker demonstrate procedures and activities sufficient to assure that the terms of the OJT contract are being met? How would you assess the quality and nature of the contacts between the broker and the employer? The participant?

D. Training Outcomes and Other Participant Benefits

1. Are employers honoring their commitments to retain participants at the wages agreed upon?

Outcomes in the form of employment is the chief benefit expected from the training. Evidence that this is probable may be past experience (or current placements if the contract is far enough along). Are placement rates likely to meet contract performance goals?

2. What are the typical wages and fringe benefits received by those participants enrolled in OJT thus far?

Are participants being paid wages comparable to other new hires? If they are paid less, how is it justified? Do they receive fringe benefits in the form of FICA, workman's compensation, health insurance, sick and vacation leave with pay, bonus, etc., as other employees do? If not, how is it justified? Of those participants retained by the employer, have they received raises and/or up-grades on the same basis as other employees?

CONCLUSION

Is there sufficient information from the responses above to expect that participants enrolled in OJT will retain employment with their employers on a permanent basis? Are the wages and fringe benefits equal to or greater than what was earned by the participants in prior employment?

E. 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. How are the training plans or outlines developed? Are they incorporated into the contract with the full knowledge of the employer?

The details of the training procedures are key to the value of the OJT contract as a training

mode. Are they specific and clear? Are there measurable objectives so that progress toward training objectives can be evaluated?

3. How is the employer and participant involved in the development of the contract and the training outline? How does the employee responsible for the actual training become aware of the contents of the training outline?

Explore how the training plan becomes actualized to learn whether the training outline is written to serve as a meaningful guide to the training as opposed to a perfunctory exercise to comply with LWIA policy. How is the length of training determined? Are the DOT and SVP codes used?

4. How is the length of training, the base for reimbursement and the reimbursement rate determined for OJT contracts? Are any OJT contracts reimbursed at a rate other than 50 percent? If so, what are the circumstances that explain this?

This question is to determine whether the responsible person is close enough to the participants and the training to be able to justify costs included in the reimbursement rate in terms of their necessity or reasonableness. Does he/she confer with other staff or the employer on these matters?

CONCLUSION

Is the process described above adequate to ensure the development of an OJT contract that provides quality training? Does it provide for the inclusion of all WIA requirements for OJT contracts and an effective training outline? Are all parties to the contract contributors to the development of the contract? Is the reimbursement base, length of training and reimbursement rate correct and in accordance with the broker's contract with OEWD?

5. 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 occupation and DOT code for which training is being provided

- _____ Training outline is incorporated in the contract and contains a schedule with appropriate time periods for learning each skill
- _____ Specifies wages to be paid and total hours to be completed
- _____ 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

CONCLUSION

F. 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.

WORKSHEET - PARTICIPANT OJT/SUPPORTED WORK

NUMBER OF FILES: _____

FILES REVIEWED: : _____

PERCENT REVIEWED: : _____

NAME and SS	WIA Contract Provision Y/N	Registration Date	Enrollment Date	Individual Service Strategy Y/N	OJT Contract Signed by Authorized	Training Plan Y/N	Training Materials Y/N	Hourly Pay Rate - % Reimbursement)	Follow-up/Case Notes Y/N	Job Evaluations/ Invoices Y/N	Employer Pre Award Survey Y/N	Completion Date	Termination Date & Code	Was Training Appropriate: Y/N
1.														
2.														
3.														
4.														
5.														
6.														
7.														
8.														
9.														
10.														

G. OJT Employer Interview

The following questions may be directed to either the personnel officer, supervisor, or CEO, if a small company. Upon introducing yourself to the employer's representative, explain that the purpose of the interview is to conduct a review of the OJT activities to assess their effectiveness and general compliance to contract requirements. Quickly review the subjects to be covered so that the employer can determine appropriate respondents and arrange for their availability. This can be done by telephone prior to the site visit. Also note that some of the information called for in this interview may be available in the contract or other records available to you. If so, complete these sections prior to the interview and use the interview to confirm and clarify those points. Questions that refer to the participant may have to be repeated if this contract covers more than one participant.

Individual(s) Interviewed:

1. How did you become involved with the WIA/OJT Program? Are you familiar with the OJT Contract between your company and the service provider/ OEWD?

The purpose of this question is to learn how well acquainted the respondent is with WIA's OJT program in general and this contract in particular. If the respondent expresses a long history or good orientation to the OJT program, less time must be spent explaining terms or why certain areas of inquiry are necessary.

2. How were you informed about the program requirements? If you have questions, from whom do you get assistance?

These questions reflect on the orientation given the employer and to what extent this has been passed down to the person responsible for the training. It is possible that the employee responsible for the participant's training has never seen the OJT contract. If the respondent learned from other employees rather than directly from the OJT contract, how did the employer's other staff learn about program rules. Does it appear that they are informed about OJT contract requirements? You may wish to briefly review the main points of the contract at this point to confirm that the employer has an adequate knowledge of the contract's requirements.

3. How was the length of the training period and participant wages determined?

This question is intended to assess the rationale for the primary contract provisions. How does the duration of training compare with the DOT or LWIA's policies for determining length of training? Look for explanations for any variance. Are participant wages comparable for

other trainees in similar occupations? How was the rate of reimbursement determined? Was it negotiated with the employer or was it simply set at 50%?

4. Does the training outline in the contract accurately state the skills necessary for the job? Review the training outline or the notes taken during the desk review with the respondent. Does the employer have a copy of the training plan? Does it appear that the information contained therein is accurate and being used to guide the training?

5. Does the training being provided OJT trainees differ from that given your regular hires in similar positions? If so, in what way?

Probe for information suggesting that OJT trainees get only the same training given hires with comparable experience and skills. Look for justification for the OJT support. Give the respondent every opportunity to show why OJT training is necessary for the participants.

CONCLUSION

Compare the responses from the interview thus far with the information from the desk review. Does the contract as written and/or implemented constitute a good OJT opportunity for WIA participants?

5. How do you go about getting WIA trainees?

Are trainees recruited by the employer? "Reverse referrals" are not prohibited, but are cause for questioning whether the OJT contract is serving the interests of the employer rather than the participant.

6. Is there evidence that the participant is making satisfactory progress in learning the new occupation?

This would indicate that there is a good match between participant interests and capabilities and the training. How is progress measured? How is the participant rated in terms of the employer's standards for learning new skills, work habits, and general productivity? Are records of progress being documented? Review the training plan.

CONCLUSION

Is there sufficient reason to believe that the training is appropriate for the participants from the information above? Does it appear that the participant is suited to the occupation and working conditions represented by the training? Does the ISS support this type of training?

7. If basic education or classroom training in the occupation is needed, how is it coordinated with the OJT?

If basic education or any type of classroom training is included in the training, it should be well coordinated with the occupation training done on the job.

8. How is the instruction provided and who is the person most responsible for training the participant?

Is the training interactive? Is the person responsible for the training knowledgeable in the occupation? What position does he or she hold in the organization? Does the trainee receive sufficient attention from the trainer? Use this question to get the respondent to describe the training, including the instructional methods, in his or her own words. Does this description match the description in the contract?

9. How do trainees learn how well they are learning?

Feedback is critical to learning and may take the form of work evaluations, comments by the supervisor, peer evaluations, or practice where they must perform a task to a set standard. Identify the form of feedback used and determine if it is sufficiently structured and regular in occurrence to promote learning.

CONCLUSION

Determine if this training serves the general aims of preparing participants for employment as described in the contract. Is it reasonable to expect that the training will be effective in achieving the skill levels required for this job. Make note of points that you feel need further confirmation from other data sources. Clarify any confusing responses before continuing with the next section.

10. To what extent are you committed to retaining this trainee as a permanent employee after the OJT program is completed? What conditions must be met?

Outcomes in the form of employment is the chief benefit expected from the training. Evidence that this is probable may be past experience with other OJT placements.

11. What other benefits do participants receive as a result as a result of their participation in training or their completion of training? Do participants receive the same benefits as regular employees?

At a minimum, normal fringe benefits include FICA, workman's compensation, health insurance, vacation and sick leave. In addition, participants may also be eligible for bonuses, pay increases, certificates, or other benefits. You may include improved self-esteem or some other behavioral change if you are sufficiently convinced that it is an intangible but important benefit.

CONCLUSION

Is there sufficient information from the responses above to expect that participants with this training will be retained in full time permanent employment as described in the contract? If not, why? Does this constitute a violation of the contract or a breach of faith? Are participant benefits equal to or better than the contract requires? Is any problem correctable?

H. Compliance with Contract General Provisions

1. OJT contracts have a number of general requirements established by state or federal law. Are you familiar with these requirements contained in your contract? Were you given an orientation to them by the case manager?

Refer to your desk review and note what general provisions are applicable to this contract. You may want to review them quickly to refresh the respondent's memory. The point of this question is to determine if the employer has a good working knowledge of these requirements. Reimbursement of cost related to the OJT contract is one of the most important contract provisions to be reviewed at this time. Comments on general compliance provisions:

CONCLUSION

Are you satisfied that the employer is aware of and is in compliance with contract provisions? Is the reimbursement base and rate as described by the employer consistent with the terms of the contract?

I. OJT Trainee Interview

The primary objective is to obtain the trainee's perception of his/her training and to verify key points of information obtained during the employer interview. Confidentiality should be assured to trainee and adverse comments should not be shared with the employer if it might appear that a trainee was the source.

Trainees Interviewed:

1. How did you find out about the job here? What did you do before you could begin on-the-job training?

This question establishes how the trainee came into contact with the employer and the procedures involved in the assessment and referral process. Look for confirmation that the screening and/or assessment process was followed and that the trainee was not current employee simply sent to the LWIA/Service Provider for referral.

2. Does the job fit your interest? Does it take into account your education and past experience and training?

Does it appear that the trainee is an appropriate match to the job?

3. Describe the training you are getting? Does the training match the training outline approved by you at the beginning of your training?

Look for confirmation that the participant was aware of the type of training to be provided and that the training is effective in teaching the desired work.

4. Who is the person most responsible for your training? What methods does he or she use to teach the necessary skills?

The purpose of this question is to confirm that the approach described in the contract is in effect. What is his or her opinion of the employer's implementation of the training outline?

5. What is your hourly wage when you started \$_____? What fringe benefits do you receive?

This question confirms wages being paid and benefits received. Is this what the trainee expected? In what way is it different?

6. Do you have any comments about the working conditions?

Look for indications that the employer is not in compliance with requirements governing work place conditions.

7. Who is your WIA counselor or contact person and how often do you see him/her?

Determine whether the participant is receiving on-going contact from the responsible party.

8. Have you ever worked less than ___ hours a week? How is your time on the job recorded? Have you ever had a complaint about your time? Have you ever signed a blank time sheet?

This question confirms that time sheets are maintained and are the basis for paychecks. Time on the job should comply with the OJT contract.

CONCLUSION

Does the participant agree with the choice of occupation, the choice of training site and the training plan? Based on the participant's comments, and perspective, how should the training be changed to make it more effective? Do any of the participant's remarks suggest a violation of the OJT contract? Is there any indication of a need for counseling? Does the participant believe that training will lead to a job that he or she wants?

XVII. COMPLAINTS/GRIEVANCES/EEO/ADA

1. Does the Center have a written procedure for addressing client complaints/grievances? (yes___) (no__)

If no, how are complaints addressed (attach additional pages if necessary)?

If yes, describe the complaint resolution process (attach additional pages if necessary)

2. Does the Center have an affirmative action plan on file? (yes___) (no__). If not, why not?

3. Are EEO posters prominently displayed in a location frequented by WIA applicants/participants? (yes___) (no___) Where?

4. Has the Center received any written complaints within the past program year? (yes___) (no___) If yes,

What type(s) of complaint(s)?

How was/were the complaint(s) resolved?

5. Are facilities accessible to disabled persons seeking services under WIA? (yes_) (no___)

If not, are alternative provisions made? (yes___) (no___) What provisions?

6. Are services provided on an equitable basis among substantial segments of the population within the service area? (yes___) (no___)

7. Is the Center's hiring process accessible to qualified disabled applicants? (yes___) (no___) What accommodations are made for this group?

8. For youth service providers that provide intake services: Do clients receive a copy of the complaint/grievance procedure at the time of intake? (yes___) (no___) Verify in File Review.

CHECKLIST:

- EEO Posters (location_____)
- EEO/Grievance Procedure
- Acceptable facility for Section 504/American with Disabilities Act (ADA) Compliance
- Complete "504" checklist annually (View.)

CONCLUSION:

XVIII. EXIT INTERVIEW CHECKLIST

Date of Exit Interview _____

Attendees:

Name

Contact No.

1. Recommendation(s) discussed

2. Finding(s) discussed

Itemize findings and recommendations

Is technical assistance advised/required?

Follow-up Scheduled Date _____