



Montgomery County Workforce Development Board, MontcoWorks Oversight Plan

REVISED: This policy was revised on 10/22/21 to add information regarding the oversight of Incumbent Worker Training and other special contracts.

REFERENCES: Workforce System Policy (WSP) No. 183-01, Oversight and Monitoring, May 21, 2018

PURPOSE: The purpose of this plan is to lay out the guidelines the Montgomery County Workforce Development Board, MontcoWorks, follows for oversight. Oversight confirms contract service provider compliance with applicable Federal, State, and Local laws; regulations; contract provisions and grant agreements; and policies. Oversight ensures that programs achieve their intended results and that grant funds and other assets are adequately safeguarded. Contract service providers must prove that they are able to meet the requirements of their contract within the timeframe and cost limits specified in their contract.

PLAN: Contract service providers will be monitored based on their level of assessed risk. Formal monitoring of contract service providers who are committed through a cost reimbursement contract, Memorandum of Understanding, Individual Training Account (ITA) contract, On-the-Job Training (OJT) contract, Incumbent Worker Training (IWT) contract, or other special contract will be conducted at least once per program year. The quality and performance of contract service provider services are reviewed in order to enhance program accountability. During site visits records and documents are reviewed, operations are observed, and ADA compliance is assessed.

Risk Assessment

MontcoWorks staff begins each program year by analyzing the level of risk each of their contract service providers has in accordance with the Risk Assessment Policy.

Oversight Activities

After determining the level of risk, MontcoWorks staff will establish the necessary oversight activities for each contract service provider. Oversight activities may include on-site visits, desk reviews, random sampling, surveys, and other types of appropriate activities.

Administrative Oversight

Administrative oversight must be conducted at least once per program year as part of formal monitoring. Administrative oversight may include, but is not limited to the following:

- Local governance
- Local plans and agreements
- Local board compliance and certification
- PA CareerLink® certification
- Organizational structure
- Administrative policies and procedures
- Sub-recipient capacity to provide oversight
- Americans with Disabilities Act (ADA) compliance

- Non-discrimination and civil rights provisions
- Equal Opportunity requirements
- PA Sunshine Act compliance
- Right-to-Know law compliance

Programmatic Oversight

Informal programmatic oversight must be conducted at least quarterly, when appropriate. The quarterly reviews may be considered as part of the annual formal monitoring.

Programmatic oversight will be conducted on Incumbent Worker Training contracts and other special contracts on an as-needed basis, no less than once per program year. Should a concern arise, programmatic oversight may need to be completed more frequently on these contracts.

Programmatic oversight may include, but is not limited to the following:

- Program management and standards
- Program policies and procedures
- Service delivery
- Access to services
- Participant eligibility
- Performance measures and program outcomes
- Services to priority and special populations
- Record retention and case file maintenance
- Sub-recipient monitoring activities
- Supportive services and needs related payments
- Youth activities
- Data analysis
- Data element validation

Fiscal Oversight

Fiscal oversight must be conducted at least once per program year. Contract service providers with medium risk must be fiscally monitored biannually and those with high risk must be fiscally monitored quarterly, when appropriate.

Fiscal oversight will be conducted on Incumbent Worker Training contracts and other special contracts on an as-needed basis, no less than once per program year. Should a concern arise, fiscal oversight may need to be completed more frequently on these contracts.

Fiscal oversight may include, but is not limited to the following:

- Fiscal agent responsibilities and activities
- Fiscal policies and procedures
- Fiscal plans and agreements
- Sub-recipient monitoring activities
- Cost allocation and allowability
- Resource sharing
- Cash management practices
- Procurement practices
- Internal controls

- Reporting requirements
- Closeout procedures
- Audits
- Sub-contract compliance
- Program income and reporting
- Property management
- Record retention
- Generally Accepted Accounting Principles (GAAP) adherence
- Payroll administration

Internal Oversight

Contract service providers must perform oversight of their services and submit periodic reports outlining their reviews, any issues of noncompliance, and the status of any corrective actions.

Internal oversight must be reviewed for Incumbent Worker Training contracts and other special contracts on an as-needed basis, no less than once per program year. Should a concern arise, internal oversight may need to be reviewed more frequently on these contracts.

Tools

Contract service providers will be reviewed based on the MontcoWorks tools that are applicable to and appropriate for their contracts.

Schedule and Timeline

MontcoWorks staff will begin scheduling oversight activities during the first quarter of each program year and will complete all oversight activities during the final quarter of each program year. A rough schedule will be created at the beginning of each program year after analyzing the approved contracts/contract service providers. As the program year progresses MontcoWorks staff will evaluate and modify the schedule and timeline as necessary. MontcoWorks will provide notification of monitoring activities to the contract service providers, except for unscheduled visits, which may be performed at MontcoWorks' discretion.

Reporting and Resolution

A report is compiled for each contract service provider after the formal oversight activity is complete. The report identifies instances of noncompliance and provides recommendations for corrective action and program quality enhancements when necessary. A copy of the formal monitoring report is provided to the monitored entity.

Should a Corrective Action Plan (CAP) be deemed necessary, a timeline is established for its completion and is based on the severity of the finding(s). Requests for CAPs must be responded to by the contract service provider within 30 days, with action taken within 90 days. The CAP must identify actions the contract service provider will take to correct the finding(s) and a timeline by which the action(s) must be completed. Technical assistance is offered to contract service providers for the purpose of enhancing program performance and accountability when necessary. Within 30 days of the receipt of the CAP, MontcoWorks will review the plan and respond to the contract service provider, addressing the acceptability of the corrective action. If findings go unresolved, MontcoWorks will no longer be able to contract with the contract service provider until and unless they are resolved.

A copy of the completed monitoring tool used to conduct the oversight activity will be made available to the monitored entity upon request.

Appeals

Contract service providers may appeal any requests for corrective action by writing a letter to the MontcoWorks Executive Director within the time allotted for the CAP response. The Executive Director will then review the appeal with the MontcoWorks Monitor and contract service provider to come to a resolution. If the parties are unable to reach a resolution through this process, MontcoWorks will follow the process outlined in the Financial Management Policy and its attached Financial Management Guide.

Sharing Information

A summary of the information gathered by MontcoWorks staff is shared with the members of the MontcoWorks board at regularly scheduled meetings. This is documented in the meeting minutes. Copies of all monitoring reports, including the tools used to complete monitoring activities, are made available to all MontcoWorks board members upon request.

An informal annual evaluation of the oversight function is performed by MontcoWorks staff to determine its effectiveness.