

**NDOL**

**WIA**

**MONITORING  
PROCEDURES  
MANUAL**

# Table of Contents

## *Part I: General Information*

Preface  
Monitoring Process  
Definitions  
Time Schedules

## *Part II: Monitor Plans*

Review Plans

## *Part III: Monitor Plans and Examples of Working Papers*

- A. [Local Workforce Investment Board](#)
- B. [One-stop Delivery System](#)
- C. [Eligibility Adult/Dislocated Worker](#)
- D. [Eligibility Youth Program \(See E. Part 2\)](#)
- E. **Youth Program**
  - E. [Part I Youth Councils](#)
  - E. [Part 2 Eligibility](#)
  - E. [Part 3 Out of School Youth](#)
  - E. [Part 4 Youth Program Design](#)
    - (i) [Program Design](#)
    - (ii) [Administration / Oversight / Reporting](#)
    - (iii) [MIS Younger Youth Goals](#)
    - (iv) [Leadership / Positive Behaviors](#)
    - (v) [Youth Supportive Service](#)
    - (vi) [Follow-up Services](#)
    - (vii) [Work Experience](#)
  - E. [Part 5 Concurrent Enrollment](#)
  - E. [Part 6 Summer Employment Opportunities](#)
  - E. [Part 7 One Stop Services to Youth](#)
- F. [Individual Training Accounts](#)
- G. [On Job Training/Customized Training](#)

- H. [Supportive Services](#)
- I. [Follow Up](#)
- J. [Equal Opportunity/Nondiscrimination/Affirmative Action](#)
- K. [Grievance or Complaints \(nondiscriminatory\)](#)
- L. [Financial Systems](#)
- M. [Property Management](#)
- N. [Procurement/Contractors](#)
- O. [Management Information System](#)
- P. [Eligible Training Provider](#)
- Q. [Additional Reviews](#)

1. Data Validation Process

2. ARAA Youth Program:

- Summer Employment
- Work Experience
- Concurrent Enrollment

# *Part I*

## *General Information*

## **Preface**

This Monitoring Procedures Manual has been developed in order to provide a reference for statewide monitoring activities. The information in the manual is intended as a guide and does not limit reviews in number, scope or format.

The manual is divided into three parts.

Part I provides general information.

Part II provides Monitor Plans. Monitor Plans include information on the monitor reviews that are regularly scheduled for each year. The most important reference of law, regulations, plans or policies are noted at the beginning of the plan. The most important documents and information needed for interviews are included along with general questions that will be answered in the monitor report.

Part III has been included for your information. It includes a copy of the monitor plan and sample formats of the type of working papers the monitors will use to review systems. The monitor worksheets formats may vary from the samples provided but will reflect law, regulation and policy.

The Workforce Investment Act places primary emphasis on program performance at the State and Local Area levels. Monitoring at State and Local Area levels will insure that proper systems are in place, are being followed, and meet the requirements of the law. To accomplish this, the State has prepared this Monitoring Procedures Manual, which includes the onsite and desktop systems, review checklists, corrective action and follow-up procedures and other items.

The reason for the emphasis on monitoring is to assist in reducing the possibility of audit exceptions, sanctions, or unallowable costs (which may have to be reimbursed to the federal government). Through the use of the established monitoring procedures, the State and local areas can minimize problems by early detection and correction.

## **Monitor Process**

- A. Notification Process:** The NDOL shall provide written notice to each entity being monitored at least ten (10) days prior to the review being conducted.

The written notice at a minimum shall inform the entity of the specific date(s) of the review, the systems or programs being reviewed, and the estimated time of arrival.

If the date(s) identified on the written notification is not convenient for the entity being monitored, the NDOL shall be contacted immediately. The entity and the NDOL will determine a mutually satisfactory date, and the review will be scheduled.

The NDOL reserves the right to conduct unannounced or unscheduled reviews as appropriate.

- B. Monitor Review Process:** The NDOL shall utilize monitor review guides to conduct objective system and program reviews. These guides may be amended as regulatory changes occur.

The monitor review may be conducted through desktop evaluation, onsite evaluation, or a combination of the two processes.

The NDOL is authorized to monitor any entity receiving Workforce Investment Act (WIA) funds, and the review may include examining program records, questioning employees, interviewing participants and entering any site or premise which receives WIA funds.

Random sample techniques will be used to perform the review of program records. The review will include as (100%) of the record universe if the universe is small or if problems are identified during the review.

Monitor review entrance conferences and exit conferences will be held with appropriate officials for each review conducted.

Monitor review working papers shall be established during the review and maintained by the NDOL.

- C. Programs and Systems:** The following programs and systems will be reviewed at least once annually. The NDOL is not limited to this list and may review other areas as necessary:

**1. Participation**

- Participant Eligibility
- Participant Priority Documentation

- Participant Assessment and Referral
- Outreach and Recruitment
- Supportive Service

## **2. Training**

- On-the-Job Training
- Occupational Skills Training
- Customized Training
- Work Experience
- Individual Training Accounts
- Eligible Training Providers

## **3. Reporting**

- Management Information Systems
- Follow-up Systems

## **4. Financial**

- Procurement
- Financial Accountability and Internal Controls
- Property Management

## **5. Additional Areas**

- Equal Opportunity
- Local Workforce Investment Boards
- Grievances or Complaints (nondiscriminatory)
- Youth Councils

- D. Monitor Reports:** NDOL shall issue a written monitor report and forward it to the entity monitored within 15 working days of the completion of the review.

The monitor report shall be published in the following format:

- Scope of Review
- Limitations (if applicable)
- Findings and Recommendations
- Corrective Action if Required
- Summary

- E. Corrective Action:** If corrective action is required as a result of the monitor review, the entity shall issue a corrective action plan to the NDOL within 30 days of the receipt of the monitor report.

The corrective action plan shall identify the action that the entity will initiate to correct the problem and the estimated date the problem will be resolved.

The entity may be required to provide a monthly progress report during any month that a corrective action plan implementation is pending or incomplete. This report will describe the progress the entity has made in the past month toward correcting those problems identified in the corrective action plan.

At the discretion of the NDOL, further reviews may be implemented. NDOL reserves the right to conduct unannounced or unscheduled monitor reviews as appropriate.

The entity will be issued a written statement to acknowledge the resolution of a corrective action.

**F. Circulation:** Copies of the monitor reports will be dispensed to the following:

- Local Workforce Investment Area Administrative Entity
- Local Workforce Investment Area Board Chair
- Commissioner of Labor
- Executive Director, Office of Employment & Training (NDOL)
- Executive Director, Office of General Counsel (NDOL)
- ~~Program Coordinator, Office of Workforce Services (NDOL)~~
- Monitor File



## DEFINITIONS

**Department or DOL** means the U.S. Department of Labor, including its agencies and organizational units.

**Designated region** means a combination of local areas that are partly or completely in a single labor market area, economic development region, or other appropriate contiguous subarea of a State, that is designated by the State under WIA section 116(c), or a similar interstate region that is designated by two or more states under WIA section 116(c)(4)

**Employment and training activity** means a workforce investment activity that is carried out for an adult or dislocated worker.

**EO data** means data on race and ethnicity, age, sex, and disability required by regulations implementing sec. 188 of WIA governing nondiscrimination.

**ETA** means the Employment and Training Administration of the U.S. Department of Labor

**Grant** means an award of WIA financial assistance by the U.S. Department of Labor to an eligible WIA recipient.

**Grantee** means the direct recipient of grant funds from the Department of Labor. A grantee may also be referred to as a recipient.

**Literacy** means an individual's ability to read, write, and speak in English, and to compute, and solve problems at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

**Local Board** means a local workforce investment board established under WIA sec. 117, to set policy for the local workforce investment system.

**NDOL means** Nebraska Department of Labor.

**Participant** means an individual who has registered under 20 CFR 663.105 or 20 CFR 664.215 and has been determined eligible to participate in and who is receiving services (except follow-up services) under a program authorized by WIA title I. Participation commences on the first day, following the determination of eligibility, on which the individual begins receiving intensive, training or other services provided under WIA Title

**Recipient** means an entity to which a WIA grant is awarded directly from the Department of Labor to carry out a program under title I of WIA. The State is the recipient of funds awarded under WIA secs. 127(b)(1)(C)(I)(II), 132(b)(1)(B) and 132(b)(2)(B).

**Register** means the process for collecting information to determine an individual's eligibility for services under WIA title I. (20 CFR 663.105, 20 CFR 664.215)

**Secretary** means the Secretary of the US Department of Labor

**Self-certification** means an individual's signed attestation that the information he/she submits to demonstrate eligibility for a program under title I of WIA is true and accurate.

**State boards** means each of the several States of the United States, the District of Columbia and the Commonwealth of Puerto Rico. The term "state" does not include outlying areas.

**Subrecipient** means an entity to which a subgrant is awarded and which is accountable to the recipient (or higher tier subrecipient) for the use of funds provided.

**Vendor** means an entity responsible for providing generally required goods or services to be used in the WIA program. These goods or services may be for the recipient's or subrecipient's own use or for the use of participants in the program.

**Wagner-Peyser Act** means the Act of June 6, 1933, as amended, codified at 29 USC 49 et seq.

**Workforce investment activities** mean the array of activities permitted under title I of WIA, which include employment and training activities for adults and dislocated workers, as described in WIA section 134, and youth activities as described in WIA section 129

**Youth activity** means a workforce investment activity that is carried out for youth.

## Time Schedules

**Notification:** Notification of impending monitor Reviews listed in the State WIA  
**(10 days)** Plan will be given ten or more days before each review.

**Monitor Report:** A monitor report will be issued within fifteen (15) working days of  
**(15 days)** the completion of the monitor working papers.

**Corrective Action:** A corrective action plan will be issued within thirty- (30) calendar  
**(30 days)** days of a monitor report that requires corrective action. This plan  
Will be issued in writing to the NDOL Office of General Counsel,  
550 South 16<sup>th</sup>, Lincoln, NE 68509-4600.

**Progress Reports:** A progress report will be issued to NDOL each month until the  
**(30 days)** until the corrective action has been accomplished.

**Monitor Report:** Additional monitor reviews may be conducted at the discretion of  
NDOL.

# ***Part II***

## ***Monitor Plans***

## **A. Local Workforce Investment Board Monitor Plan**

**WIA 117**

**20 CFR 661**

**20CFR667**

**State WIA Policy**

**State Plan**

**Purpose:** Nebraska Department of Labor, Office of General Counsel Program Monitor will conduct a desk review of Local Workforce Investment Boards to examine compliance with the Workforce Investment Act (WIA), its implementing regulations and policies regarding agreements, board membership, appointment procedures and areas of representation, responsibilities and activities.

**Documents:** Documentation collected and examined within the course of review will include but not necessarily be limited to the following:

1. LWIB membership list
2. Agreements/by-laws
3. Certification
4. Minutes
5. Public Announcements
6. Oversight Activities/Plans
7. Local Plan
8. Schedules
9. Public Notifications
10. Nominations
11. Policies

**Interviews:** No interviews will be conducted.

**Questions:** The following questions will be addressed as a part of this review:

1. Does the local board composition meet the requirements of the law?
2. Does a written agreement exist between the chief elected official and the local board?
3. Does the local board conduct business in an open manner?

## **B. One-Stop System Monitor Plan**

**WIA121, 134**

**20CFR662, 20CFR663**

**State Workforce Investment Plan**

**State WIA Policies**

**Purpose:** NDOL, Office of General Counsel Program Monitor will conduct onsite review of One-Stop operations to evaluate compliance with Workforce Investment Act (WIA), regulations and State policy. Areas of review will be characteristics, services, and the implementation of policies and procedures.

**Documents:** These documents will be examined as part of the review:

MOU

- Outreach materials
- Written policies and procedures
- Customer Service Survey
- Performance Information
- Service Schedules (When services are available.)
- Local Area Plan

**Interviews:** Interviews will be conducted as necessary with:

- One-Stop Operating Entity designated staff
- Local Board Administrative staff

**Questions:** The following questions will be addressed in this review:

1. Does the local area have at least one certified physically comprehensive full-service one-stop?
2. Has the local board selected a one stop operator through a competitive process?
3. Does the local area one-stop system include supporting centers such as affiliated sites, networks of partners or specialized centers?
4. Does the comprehensive one-stop include all mandated partners with fully executed Memorandums of Understandings (MOU)?
5. Does the One-Stop have procedures in place to ensure that each partner contributes a fair share of the operating costs of the delivery system agreed upon through the MOUs?
6. Does the One-Stop system deliver core services and ensure availability Monday through Friday (minimum of 40 hours per week) as by State policy?
7. Does the One-Stop conduct outreach, intake and orientation to information and other services available through the system?
8. Does the One-Stop provide information on its performance record to customers and the interested general public?
9. Does the One-Stop have procedures in place to provide access to other activities and programs carried out under the partners authorizing laws?
10. Does the One-Stop provide integrated services including a single point of entry?
11. Does One-Stop include an accessible resource room which meets policy requirements?

### **C. Adult/Dislocated Worker Eligibility Monitor Plan**

**WIA 101, 122, 134, 189**

**20CFR663**

**20CFR667**

**State WIA Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel monitor will conduct comprehensive oversight of Workforce Investment Act (WIA) Adult and Dislocated Worker Programs. The purpose of the oversight activities will be to determine whether programs are being operated in accord with the provisions of the Workforce Investment Act, WIA regulations, State policies and the provisions of the Local Workforce Investment Boards. The following areas will be scrutinized as a part of this review:

1. Outreach
2. Registration Process
3. Assessment Process
4. Eligibility and Priority determination and documentation process
5. Supportive Service determination
6. ITA process and documentation

**Documents:** These documents will be examined as a part of this review:

1. Participant Records
2. Assessments
3. Eligibility Documentation
4. Supportive Service records
5. Individual Employment Plan

**Interviews:** Formal interviews with director or designated staff.

**Questions:** The following questions will be addressed:

1. Does the local area conduct outreach and recruitment to reach targeted populations?
2. Does the local area have a registration process in place that assures registration is completed prior to intensive services?
3. Does the local area assess individuals for skill levels, abilities and supportive service needs?
4. Does the local area provide supportive service as necessary while ensuring that support is not available elsewhere?
5. Does the local area have a process in place to document a "Determination of Need" has been made?
6. Does the local area determine and document eligibility and priority selection?
7. Does the local area maintain and retain documents and records and make them available as required?

## **D. Youth Eligibility Plan**

*(See also Youth Program, Part 2, Youth Eligibility Review)*

**WIA Sec. 101 and 189**

**20 CFR 664**

**State Plan**

**State Policy**

**Background:** This review may be a separate review or may be included in the Youth Program Review.

**Limitations:** This review will be limited to eligibility and assessment necessary for eligibility determination.

**Purpose:** To review the Youth Eligibility determination process for compliance to law, regulation, and policy.

**Documents:** The following documents will be examined as a part of the review.

1. The Local Board's service plan
2. Local Board records including Youth Council records
3. Youth Program evaluation plans and procedures
4. Management Information System Records
5. Participant records and eligibility determination procedures

**Question:** These questions will be addressed.

1. Does the Local Area have a system determine and document participant eligibility?
2. Does the Local Area ensure participants are assessed to determine if they are deficient in basic literacy skills?
3. Does the Local Area have a policy to define "requires additional assistance to complete an educational program or to secure and hold employment" included in the local plan?
4. Are concurrent youth eligible for both the youth program and for the adult or dislocated worker program?



**E.** Youth Program, Part 1, Youth Council Review Plan  
WIA Section Sec. 117 & 123  
20 CFR 661.335  
20 CFR 661.340  
20CFR664.100-110  
Legislative Gill 193  
State Law  
State WIA Policy

**Purpose:** To review the Youth Council requirements including membership and responsibilities.

**Documents:** The following documents will be examined as a part of the review.

1. The local board's service plan
2. Youth Council membership and area of affiliation list
3. Meeting minutes or/and notice of meetings
4. Monitor and evaluation plans or procedures
7. Schedules
8. Oversight Activities
9. Minutes

**Interviews:** This review will include interviews of local area staff, service contractors and providers.

**Questions:** These questions will be addressed.

1. Does the Local Board's Youth Council meet the membership requirements of WIA?
2. Does the Youth Council hold meetings and provide input to the local board?
3. Does the Youth Council coordinate youth activities in the local area?
4. Does Youth Council provide oversight, monitoring and evaluation of the delivery of services to youth?
5. Has the Youth Council been authorized by the chairperson of the local board to carry out other duties? If so what are these duties?

**E. Youth Program, Part 2, Youth Eligibility Review Plan**  
**WIA Sec. 101 and 189**  
**20 CFR 664**  
**State Plan**  
**State Policy**

**Background:** This review may be a separate review or may be included in the Youth Program Review.

**Limitations:** This review will be limited to eligibility and assessment necessary for eligibility determination.

**Purpose:** To review the Youth Eligibility determination process for compliance to law, regulation, and policy.

**Documents:** The following documents will be examined as a part of the review.

1. The Local Board's service plan
2. Local Board records including Youth Council records
3. Youth Program evaluation plans and procedures
4. Management Information System Records
5. Participant records and eligibility determination procedures

**Question:** These questions will be addressed.

1. Does the Local Area have a system determine and document participant eligibility?
2. Does the Local Area ensure participants are assessed to determine if they are deficient in basic literacy skills?
3. Does the Local Area have a policy to define "requires additional assistance to complete an educational program or to secure and hold employment" included in the local plan?
4. Are concurrent youth eligible for both the youth program and for the adult or dislocated worker program?

## **E. Youth Program, Part 3, Out of School Youth Plan**

**WIA Sec. 101 and 129**

**20 CFR 664.300, 664.310, 664.320**

**State Plan**

**State Policy**

**Purpose:** To review the systems used to identify and track out of school youth to ensure at least 30% (less allowed administrative expenditures) of funds allocated for youth are expended for individuals that are eligible under the Out of School Youth category.

**Documents:** The following documents may be examined as a part of the review.

1. The Local Board's Service Plan.
2. Management Information Systems Records
3. Service Provider Records
4. Financial Records
5. Participant records

**Interviews:** Interviews may be required depending on the design of the systems.

**Questions:** These questions will be addressed.

1. Does the State have a waiver on youth funds?
2. Does the Local Area ensure individuals are determined and documented eligible for participation in the Out of School category?
3. Does the Local Area ensure the expenditure of no less than 30% of allocated youth funds are spent on Out of School youth?
4. Does the Local Area ensure records are retained and maintained for the required time?

**E. Youth Program, Part 4 (i) Youth Program Design Plan  
Elements, and Parameters  
WIA Section 129, 134, 136, 169  
20 CFR 400  
State Workforce Investment Plan  
State Policy**

**Purpose:** Review the design and delivery of the youth program.

**Limitation:** This review (Part 4) is divided into seven sections, i-vii, because of the number of records and the complexity of the services provided. All 7 sections will be reviewed during the year and a report will be issued for each section of Part 4 either separately or as one report. The information from the Plans and Worksheet for the Part 4 (i) to Part 4 (vii) will be used to answer the questions in Plan 4.

**Documents:** These documents will be examined as a part of the review.

1. State Plan
2. Local Area Plan
3. Contracts, agreements or similar records
4. Participant Records
5. Records of service availability and delivery
6. Management information systems records

**Interviews:** This review will include interviews.

**Questions:**

1. Does the Local youth program design and delivery adequate to meet requirements in the following areas?
  - a) Assessment
  - b) Individual service strategies, career goals
  - c) Preparation for postsecondary education and employment, linkages
  - d) Provision of Intake, objective assessment, ISS
  - e) Program elements
  - f) Board linkages
  - g) Income eligible youth referral
  - h) Eligible youth (basic skills or training needs) referral
  - i) Inclusion of youth, youth parents, youth leaders in planning programs
  - j) Board use of objective assessments from other programs

**E. Youth Program, Part 4 (ii) Youth Program Design Plan  
Elements, and Parameters  
Administration, Oversight and Reporting  
WIA Section 129, 134, 136, 169  
20 CFR 400  
State Workforce Investment Plan  
State Policy**

**Purpose:** To review the Local Area's procedures for reviewing administration, oversight and reporting to the State on information and data for the Youth Program.

**Documents:** These documents will be examined as a part of the review.

1. State Plan
2. Local Area Plan
3. Contracts, agreements or similar records
4. Participant Records
5. Records of service availability and delivery
6. Management information systems records

**Interviews:** This review may include interviews.

**Questions:**

1. Does the Local Area monitor participant and budget data to ensure the participant numbers and budget numbers are meeting plan expectations?
2. What system does the Local Area use to ensure accurate and timely oversight and reporting of the Youth Program budget and participant data? (Include a description of the system to identify and correct and discrepancy between plan expectations and actual data including the submission of revised plans to the state).

**E. Youth Program Part 4 (iii) Worksheet**  
**Management Information System**  
**Younger Youth (Goals)**

**Purpose:** To ensure the Local Area develops younger youth goals and enters the goals into the Management Information System.

**Documents:** These documents will be examined in this review.

**Interviews:** This review may include interviews.

**Questions:** These questions will be addressed.

1. Does the information on the MIS form agree with the information in the participant file?
2. Are math and reading evaluation instruments adequate to meet WIA requirements?
3. Is the system to identify and document goals and evaluate supportive service adequate to meet WIA requirements?
4. Is the goal data entered in to the MIS system promptly?

**E. Youth Program, Part 4 (iv)**  
**Leadership Services for Youth Plan 20 CFR 664**  
**Positive Social Behaviors for Youth Plan 20 CFR 664**

**Purpose:** To determine what leadership service are offered to Youth.

**Documents:** These documents will be examined as a part if the review.

1. State Plan
2. Local Area Plan
3. Participant files
4. Provider contracts and similar records.

**Interviews:** This review may require interviews:

**Questions:**

1. What leadership services are provided for Youth?
2. What process is used to determine who will participate in various leadership activities?
3. What positive social behavior activities are provided for Youth?
4. What process is used to determine who will participate in social behavior activities?

**E. Youth Program, Part 4, (v) Youth Supportive Service Plan**  
**WIA Sec. 101, 129**  
**20 CFR 664.400**

**Purpose:** Review the determination and delivery of youth supportive services by examining records of the following areas:

1. Supportive Services provided in the Local Area.
2. Supportive Services for Younger Youth.
3. Supportive Services for Older Youth.
4. Determination and documentation of need.
5. Coordination of groups that will deliver services.
6. Financial tracking of supportive services costs
7. Maintenance of Records

**Documents:** These documents will be examined as a part of the review.

1. The Local Board's Service Plan
2. Contracts, agreement, or similar records
3. Participant records
4. Records of service availability and delivery
5. Management information records

**Interviews:** This review will may include interviews.

**Question:** These questions will be addressed?

1. What services are available?
2. How are services needs determined and documented?
3. How is coordination achieved between groups that deliver services?
4. How is cost tracked for fiscal purposes?
5. Are records available and maintained for the required times?



**E. Youth Program Part 4 (VI)**  
**Follow-up Service for Youth Plan**  
**664.450**

**Background:** Follow-up services may include leadership and supportive services allowed by WIA. Every youth must receive some form of follow-up service for 12 months. The follow-up service must be determined based on the needs of the individual. Those youth that participated in summer youth employment opportunities may be offered less intensive services.

**Purpose:** To ensure the Local Area provides follow-up service determined on participant need and for the required 12 months after exit from the program.

**Documents:** These documents will be examined as a part of the review.

1. State Plan
2. Local Plan
3. Provider Contracts or agreements
4. Management Information records
5. Participant files
6. Reporting records and documentation

**Questions:**

1. Does the Local Area provide WIA leadership development activities as follow-up services?
2. Does the Local Area provide WIA supportive service as follow-up services?
3. Does the Local Area provide contact with a youth's employer?
4. Does the Local Area provide assistance with better jobs, career development and further education?
5. Does the Local Area provide work-related peer support groups?
6. Does the Local Area provide adult mentoring?
7. Does the Local Area track the progress of youth in employment after training?
8. Does the Local Area evaluate and determine follow-up service based on the needs of the individual?
9. What follow-up services are available to youth that have participated in only summer employment opportunities?

## **E. Youth Program, Part 4, (vii) Work Experience Plan**

**WIA 129**

**20 CFR 664.460, 664.470**

**State Plan**

**State Policy**

**Background:** Youth Work Experiences are planned, structured learning experience in a workplace for a limited time. The workplace may be a private for profit employer, non-profit employers or public employers. The time spent at the workplace may be paid or unpaid. The main purpose of the work experience is to provide a youth with opportunities for career experience and skills development. (Although the employer may benefit from the youth's labor this is not the purpose of the Work Experience)

**Purpose:** To ensure Youth Work Experiences meet the requirements of Law, Regulation and Policy.

**Documentation:** The following documents may be examined as a part of the review.

1. The Youth's assessment and employment plan or individual service strategy or employment plan.
2. Management Information System Records
3. Records of work experience duties and skills to be learned, work times and attendance, and other records relating to the work experience.
4. Records including justification if a youth is receiving on-the- job-training and is under 18 years of age.
5. Financial records for youth that are receiving wages funded with youth funds.

**Interviews:** Interviews may be required as a part of the review.

**Questions:** These questions will be addressed in the review?

1. Is there a written description of the work experience?
2. Does the description include information on wages, duties, attendance requirements, skills, attributes or knowledge the work experience is intended to provide?
3. Were the results of the objective assessments, interests, goals and the Individual Service Strategy of the youth considered in the decision to choose a certain work experience?
4. How does the youth participate in decision making concerning work experience?
5. How are the expenditures of funds for work experience wages tracked and documented?
6. How are records maintained and retained for the required time?

**E. Youth Program, Part 5, Concurrent Enrollment**  
**WIA Sec. 126**  
**20 CFR 664**  
**State Plan**  
**State Policy**

**Purpose:** To review congruent enrollment systems to ensure compliance with law, regulation and policy.

**Documents:** The following documents will be examined as a part of the review.

1. Local Area plans and policies
2. Participant records
3. Participant and fiscal records

**Questions:** The following question will be addressed.

1. Does the Local Area ensure that concurrently enrolled participants are eligible for both programs?
2. Is the mix of services recorded in the participant's employment plan?
3. Does the Local Area ensure that program operators expend and track funds to ensure there is no duplication of expenditures?
4. Are records maintained for the required time?

**E. Youth Program, Part 6, Summer Employment Opportunities**  
**WIA Chapters Four and Five**  
**20 CFR 664**  
**State Plan**  
**State Policy**

**Purpose:** To review the Local youth Program to ensure summer youth opportunities

**Documents:** These documents will be reviewed.

1. Local Area Plans
2. Participant Records
3. Management Information Records
4. Provider Contracts
5. Fiscal Records
6. Follow up services Records

**Question:** These questions will be addressed.

1. Does the Local Area offer an integrated Summer Employment Opportunities experience?
2. Does the Local Area offer all participants in the Summer Employment Opportunities experience 12 months of follow up services?
3. Were services provider contracts awarded through the competitive procurement processes? (excluding the grant recipient / fiscal agent and employers providing unsubsidized employment)
4. Have youth participants in the Summer Employment Opportunities been properly included in the core measurement used to determine performance?

**E. Youth Program, Part 7, One-Stops to Service to Youth  
Plan and Worksheet  
WIA Sec. 121, 129  
20 WIA 664.700, 664.710  
State Plan  
State Policy**

**Purpose:** To determine services provided and ensure a system to identify the systems and controls used to ensure the proper expenditure of WIA funds.

**Interviews:** Interviews may be required as a part of this review.

**Questions:** These questions will be addressed as a part of the review.

1. Is the Chief Elected Official (or designee) a One Stop Partner?
2. Does the youth program and the One Stop system include additional connection to facilitate:
  - 1) Coordination and provision of youth activities?
  - 2) Linkages to the job market and employers?
  - 3) Access for eligible youth to the information and service required in Sec 664.400 and 664.410?
  - 4) Other activities described in WIA Sec. 129 (a) and 121 (b) (1) (B) (i)
3. Does the local area have systems and controls in place to ensure that Youth Funds are expended only on eligible youth. The Local Area may offer non-eligible youth those services authorized by other programs.
4. Are records retained and maintained for the required period?

## **F. Individual Training Accounts (ITA) Monitor Plan**

**WIA 122, 134**

**20 CFR 663.320, 663.410-440, 663.508**

**State WIA Policy**

**Purpose:** NDOL, Office of General Counsel Program Monitors will conduct a desk review of Individual Training Accounts (Its) policies and procedures. This oversight is to provide a picture of ITA issuance, usage and customer use as it is implemented in the local area in comparison to the Act, Regulations and Policy of Workforce Investment Act Title I program operations. Documentation and other information may be recorded, gathered or copied as a part of onsite program or activity reviews and retained for this oversight activity.

**Documents:** These documents will be reviewed as part of this review:

1. MIS Occupational Skills Training Printout
2. Eligible Training Provider Lists
3. Participant Record
4. ITA Printouts
5. Individual Employment Plan (IEP)
6. Local Workforce Investment Board Records
7. Local Workforce Investment Board Policies
8. Local Workforce Investment Act Plans

**Questions:** These questions will be addressed by this review:

1. Does the local board have a policy in place that defines skills in demand occupations?
2. Does the local area provide assessment, counseling, and development of an IEP through intensive services prior to selecting a training program?
3. Does the local area have a policy in place for exceptions to the list of locally recognized demand occupations?
4. Does the local area have systems in place to communicate in simple, understandable language the ITA training services policy to customers, including delivery method?
5. Does the local area have a policy in place regarding the duration and/or dollar amount of ITAs?
6. Does the local area have a policy in place which identifies the content of the ITA (books, fees, or other instructional materials)?
7. Does the local area have policies or procedures in place, which document that other assistance is unavailable or insufficient?
8. Does the local area have a formal process for tracking WIA Title I expenditures paying for ITAs?

9. Does the local area have a method for disbursement of funds limiting training providers that are on the list of eligible training providers as the only parties able to redeem ITAs for payment?
10. Has the local board identified any exceptions to the ITA requirement in addition to on-the-job training or customized training components?

**G. On the Job Training (OJT)/Customized Training Monitor Plan**  
**WIA 101, 134, 181, 188, 195**  
**20 CFR 663663.700-720,**  
**667.200-274, 29CFR98, 29CFR93, 29CFR31**  
**State WIA Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct a desk review of policies and procedures for OJT and customized training for adults and dislocated workers. Compliance to the Workforce Investment Act (WIA), regulations and State policies will be examined for training activities, employer orientation, agreements, record keeping and evaluation.

Documentation, information and participant records will be requested, examined and copied as part of other onsite reviews and retained for completion of this desk review. Records of the following areas will be examined:

- Availability of information
- Provider eligibility process
- Agreements/Contracts
- Oversight process

**Documents:** These documents will be examined as a part of the review of OJT and customized training

1. Employer Selection/Evaluation prior to contract
2. Employer Orientation
3. OJT Contract/Agreement
4. Basis for activity selection
5. Customized Training Contract/Agreement
6. Oversight record
7. Participant record
8. MIS activity report

**Interviews:** Questions relating to this area may be included in other onsite interviews or staff may be contacted by phone for clarification.

**Questions:** The following questions will be addressed as part of this review:

1. Does the local area limit training services to Adults & Dislocated Workers who have received an intensive service, been determined in need of training services, and documentation retained in participant record?
2. Does the local area have a process in place to determine appropriateness of training, participants and providers?



3. Does the local area have an appropriate process in place for approval of customized training?
4. Does the local area require that employers pay not less than 50 percent of the cost of customized training?
5. Does the local area have an appropriate agreement in place for OJT and customized training?
6. Does the local area have an appropriate oversight process?
7. Does the local area maintain and retain documents and records and make them available as required?
8. Do OJT contracts contain the required assurances?

## **H. Supportive Services for Adult/Dislocated Worker Programs Monitor Plan**

**WIA 101, 134**  
**20 CFR 663**  
**State WIA Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitors will conduct oversight of procedures and practices for supportive service and needs related payments as they comply with the Workforce Investment Act (WIA), regulations and State Policy. Documentation and information may be gathered and retained as a part of other onsite reviews and used for completion of the Supportive Service desk review.

**Documents:** These documents will be examined as part of this review:

1. Written policies, if available
2. LWIB Records
3. Supportive Service Authorization/Request/Documentation
4. Participant File
5. Policy for information sharing on local resources

**Interviews:** Questions relating to this area of review may be raised during onsite interviews for eligibility or staff may be contacted by phone for clarification of gathered information.

**Questions:** These questions will be addressed by this review:

1. Does the local area have systems in place to limit supportive services to individuals participating in core, intensive or training services?
2. Does the local area have procedures in place to show that supportive services are not available through other programs providing such services?
3. Does the local area have systems in place to document that supportive services are necessary to enable individuals to participate in activities?
4. Has the local Workforce Investment Board limited supportive service amounts and types of allowable services or granted authority to the One-Stop operator to establish such limits?
5. Have procedures for exceptions been established by either of the above?
6. Does the Local Area provide Needs Related Payments (NRP) in an appropriate manner?

**I. Follow-up Monitor Plan**  
**WIA134, 129**  
**20CFR662, 663, Preamble**  
**State WIA Policy**

**Purpose:** NDOL, Office of General Counsel Program Monitors will conduct a review of local area Follow -Up process and practices for Adult, Dislocated Worker and Youth WIA Title I Financially assisted programs. Practices as well as policies will be compared to the Act, Regulations and State Policies for Workforce Investment Act programs. Participant Records may be reviewed in combination with other onsite reviews and documentation retained for this review.

**Documents:** These documents will be examined as part of the review:

1. MIS Activity Reports
2. Participant Records
3. Local Area Follow-up Policy

**Interviews:** Interviews will be conducted as necessary to explore policies and practices with the following:

1. Local Workforce Investment Area Director
2. Local Workforce Investment Area Staff

**Questions:** The following questions will be addressed in this review:

1. Does the local area have an appropriate policy in place to provide follow-up services for to Adult and Dislocated Workers
2. Does the local are have an appropriate policy in place to provide follow-up services to Youth?
3. Does the local area provide appropriate services as follow-up activities?
4. Is the process for determining follow-up service activities and duration documented in participant files?
5. Does the local area record follow-up contact in first, second and third quarter after exit into the Tracking and Retrieval Exchange (TREX) database?

**J. EO/Nondiscrimination Monitor Plan**  
**WIA 1998**  
**ARRA 2009**  
**20CFR667, 29 CFR 37**  
**NDOL Equal Opportunity/Nondiscrimination Manual**  
**State WIA Policy**  
**State Plan**

**Purpose:** To review compliance of procedures for EO/Nondiscrimination to the law and regulations. To establish that local area delivery of programs is being conducted in a nondiscriminatory manner.

**Documents:** Information and materials collected and encountered during annual program reviews will be considered in the evaluation of compliance. Documents examined for this review may include, although not necessarily limited to, the following:

- Local Area Equal Opportunity Officer (EOO) information
- Organizational Chart (identifying EOO)
- Publication of EOO (to include contact information)
- Discriminatory Complaint Logs
- Complaint Process
- Staff Demographics
- Personnel Activities
- Local Plan
- Training Plans
- EOO Reviews
- Limited English Proficiency Service Plan
- MIS Reports
- Participant Files
- Recruitment Materials (brochures, advertisements)
- Policies and Issuance

**Interviews:** Interviews or questionnaires may be addressed to these parties:

- Local Area EO Officer
- Department of Labor, Human Resources
- Local Area Administrator

**Questions:** The following questions will be addressed in this review:

1. Has the Workforce Investment Board named an Equal Opportunity Officer meeting the criteria implementing regulations able to fulfill EOO responsibilities?
2. Does the local area provide initial and continuing notice of the EOO, contact information and program declarations that it does not/cannot discriminate on prohibited grounds?
3. Do contracts, RFPs, plans, OJT (contracts and/or PreAwards) and other financial assistance agreements contain prescribed assurances?
4. Does the local area take appropriate steps to ensure that they are providing programmatic and architectural universal access to their programs and activities by making reasonable efforts to include members of both sexes, various racial and ethnic groups, individuals with disabilities and individuals in differing age groups?
5. Does the local area take appropriate steps to ensure that communication with individuals with disabilities are as effective as communication with others including a process to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of programs and activities which includes processes for reviewing and furnishing auxiliary aides or services when necessary?

6. Does the local area have a Limited English Proficiency Plan to provide service in areas where a significant number or proportion of the population may need languages other than English in order to be effectively informed about, or able to participate in programs or activities?
7. Does the local area collect equal opportunity data maintaining in program information systems able to report out on applicants and participants including demographic information sufficient to determine whether they have complied or are complying with nondiscrimination and equal opportunity provisions?
8. Has the local area developed and published, on behalf of its service providers, a complaint processing procedure to include: initial written notice of receipt, written statement of issues, period of fact-finding or investigation, alternative dispute resolution (ADR), written notification of final action?
9. Is there a system in place to promptly notify the U.S. DOL Civil Rights Center Director when administrative enforcement actions or lawsuits are filed against it alleging discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief and/or beneficiaries only, citizenship or participation?

## **K. Grievance Procedures Review Plan**

**WIA Sections 188**

**20 CFR 667.270, 20CFR667.600-630**

**State Plan**

**State Policy**

### **Background:**

The entity is required to establish a procedure for grievance and complaints. The local area's procedure should include:

- a process that makes reasonable effort to assure that the information concerning grievance and complaint procedures will be understood by participant and other individuals, including youth and those who are limited-English speaking individuals (as required by 29 CFR 37.35)?
  - a process for dealing with grievances and complaints from participants and others affected by Workforce Investment including One Stop Partners and providers?
  - an opportunity for an informal resolution and hearing within 60 days of filing?
  - a process to allow individual alleging labor standards violations to submit the grievance to binding arbitration procedures if a collective bargaining agreement has provisions that would apply to parties involved in the dispute?
  - an opportunity for the local level to appeal to a State entity when
  - no decision is reached within 60 days?
- or**
- either party is dissatisfied with the local hearing decision?

**Purpose:** Review Grievance Procedures by interviewing staff and examining records to answer these questions.

**Documents:** These documents will be examined as a part of the review:

Written grievance procedures.

Method of dissemination of procedures.

Records of complaints, grievances and resolution or advancement to State level.

**Interviews:** This review may require formal interviews.

**Questions:** These questions will be addressed.

1. Does the Local Area have a Grievance Process?
2. Is the Grievance Process made available to all interested parties?
3. Does the Grievance Process allow for appeal to the State entity as required?
4. Is the Grievance Process adequate to meet the WIA requirement?
5. Are records of the complaints, grievances, appeals and resolutions maintained?

**L. Financial Oversight Review Plan**  
**Workforce Investment Act of 1998**  
**Social Security Act (Amended) Sec. 403**  
**29CFR Part 667, 20CFR645, 29CFR97**  
**29CFR95, 48CFR31; 31 CFR205,**  
**OMB A-133, A-122, A-87, A-21**  
**WIA State Policy**  
**WtW Fiscal Systems and**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct comprehensive financial oversight of Workforce Investment Act (WIA) and Welfare-to-Work (WtW) programs. The purpose of these oversight activities is to assess the fiscal accountability of WIA and WtW within the Local Workforce Investment Areas of Nebraska.

The monitoring team will conduct financial oversight through site visits, desk reviews and analyses of fiscal activities, records and reports. The review will seek to ensure that the entities under review are in compliance with applicable uniform administration requirements and the Office of Management and Budget (OMB) Circulars are being followed with respect to relevant cost principles. Fiscal reviews will be conducted to ensure that resources are efficiently and effectively used for authorized purposes and that internal controls and accounting procedures are in place to protect from waste, fraud and abuse. Financial system oversight reviews will be conducted on an annual basis with the possibility of altered frequency to reflect need and review history of the entities subject to review

**Documents:** These documents will be examined as a part of this review:

1. Notice of Obligation
2. Title I Plans and approval document
3. Quarterly Reports
4. Monthly Fiscal Reports
5. MIS reports (including participant data reports)
6. Request for reimbursement/drawdown records
7. Organizational chart/description of fiscal systems
8. Chart of funds
9. Accounting procedures
10. Accounting records
11. Cost allocation chart
12. Additional records necessary to trace expenditures
13. Local Area written policies and procedures

**Interviews:** Interviews will be conducted as deemed necessary, with:

1. Local Workforce Investment Area Administration
2. Fiscal Officers
3. Personnel of the entity identified by the Local Workforce Investment Board as responsible for the receipt and disbursement of funds.

**Questions:** The following questions will be addressed by the review:

1. Does the local area have financial management systems in place which allow for completion of accurate, current, and complete disclosure of financial results of financially assisted activities to meet federal reporting requirements?
2. Does the local area have financial management systems in place which meet the requirements for record maintenance which adequately identify the source and application of funds expended for financially assisted activities?
3. Does the local area have financial management systems in place, which provide effective control and accountability of assets?
4. Does the local area have procedures in place for comparison of actual expenditures or outlays to budgeted amounts?
5. Does the local area financial management system ensure that OMB costs principles, agency program regulations and terms of grant will be followed in determining the reasonableness and allowability of cost?
6. Does the local area maintain accounting records in support of expenditures for cancelled checks, paid bills, payrolls, time and attendance records, contract and subgrant award documents etc?
7. Does the local area maintain and retain records and documents as required?
8. Does the local area financial system maintain a minimal time-lapse between transfer of funds and disbursement of those funds?
9. Does the local area accounting system perform sufficiently to allow for tracking of compliance to the administrative costs limit of WIA?
10. Does the local area accounting system perform sufficient to all for tracking expenditures to verify that WtW expenditures of "other category" participants has not exceeded 30% of the grant?
11. Does the local area accounting system perform sufficiently to allow for tracking of in and out of school youth participants and expenditures?



## **M. PROPERTY MANAGEMENT MONITOR PLAN**

**29CFR667**

**29CFR95**

**29CFR97**

**WIA 184, 188, 193, 195**

**OMB Circulars**

**State WIA Policies**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitors will conduct an annual desk review of local area policies and practices of property management for compliance with Workforce Investment Act (WIA), regulations, and State Policies. Areas of examination will include inventory, property management procedures and related record keeping practices.

**Documents:** The following documents will be reviewed as a part of this review:

1. Inventory Records
2. Property Management Policy
3. Most recent physical inventory report.

**Questions:** The following questions will be addressed in this review:

1. Does the local area have a property management system that meets requirements?
2. Does the local area have an inventory system that meets requirements?
3. Is a physical inventory completed every two- (2) years?
4. Are property records maintained for three (3) years after final reporting?
5. Has any property purchased with WIA monies been disposed of since the last review?

## **N. Procurement Standards Review Plan**

**WIA 112, 117, 121 123, 184,**

**20 CFR 664.610, 667.200**

**29 CFR Parts 95, 97, and 98**

**TEGL 9-00 (Youth Programs)**

**State Workforce Investment Plan**

**State Policy Issuance**

**Purpose:** Review the process to award funds and deliver goods and services to ensure processes meet the federal, state and local procurement standards.

**Documents:** These documents will be examined as a part of the review:

1. State Plan
2. Local Board Plan
3. State Policy Issuances
4. Contracts, agreements, or similar documents
5. Procurement procedures and documentation
6. Federal and/or state and/or city requirements, laws and regulations.

**Interviews:** This review will include staff interviews.

### **Questions:**

1. Does the Local Area have written procurement procedures?
2. Do the procedures meet the requirements of the Workforce Investment Act?
3. Do the procedures meet the requirements of the federal and / or state and / or city procedures?  
Including the following areas: Administration Systems, Affirmative Action, Bonding, Codes of Conduct / Conflict of Interest, Competition, Confidentiality and Non-Disclosure, Contract Provisions, Cost Analysis, Debarred and Suspended Parties, Documentation and Awarding Agency Review, Economy and Efficiencies, Methods of Procurement, Protest Procedures, and Transactions between Units of Government.
4. Have One-Stop operators been properly designated and certified?
5. Have funds for youth activities been awarded competitively or within the allowed exceptions?
6. Has the Local Board applied for a waiver to deliver in house programs? (if so, an additional review will be completed.)
7. Are records available and maintained for the required time?

**O. MIS (Management Information System) Monitor Plan**  
**WIA 134, 185**  
**20 CFR 667,666**  
**TREX (Tracking and Retrieval Exchange – NE MIS System) Manual**  
**State Plan**  
**State Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct oversight of use of the MIS (Management Information Systems) to collect informational data necessary for reporting. All reviews automatically review a sample of MIS reports against the information in the participant file. If an excess number of errors are noted, the scope of the review will be expanded to identify the problem and to determine if corrective action is needed.

**Documents:** The following documents will be examined as part of this review:

1. MIS Manual
2. MIS printouts
3. Participant files
4. Fiscal reports

**Interviews:** Staff may be interviewed in person or by phone if determined necessary upon completion of a desk review. Content of interviews will be designed to clarify or resolve the problem in question.

**Questions:** The following questions will be addressed:

1. How is the MIS system coordinated with local areas to assure that information is current and up to date?
2. Does the local area have a system in place to ensure that data is entered in an accurate and timely fashion?
3. Does the Administrative Office receive information from the local area as required for federal reports?
4. Does the local area have a system in place, which identifies at what point registration is completed?

**P. Eligible Training Provider Monitor Plan**  
**20 CFR663.505- 508**  
**State WIA Policy**  
**State Plan**

**Purpose:** NDOL, Office of General Counsel Program Monitors will conduct oversight of the policies and procedures for development and maintenance of the Eligible Training Provider List. This review will include an examination of the NDOL office responsible for the computerized list and the means of information sharing at the state level. The review will also address the responsibilities and activities of the local board. The review will be conducted as a desk review with the local workforce investment areas supplying information and documentation. Program monitors reserve the right to an additional onsite review if information provided indicates the necessity.

**Documents:** These documents will be reviewed as part of this review:

Provider List

- State
- Local

Policies

- State
- Local

Provider application

Performance Information

Local Workforce Investment Board related records

State Workforce Investment Board related records

MIS Printouts

**Local Information: Questionnaires** will be completed by the following as needed:

1. One-Stop Staff
2. Provider
3. NDOL Staff

**Questions:** These questions will be addressed by this review:

1. Have the Eligible Training Providers met the requirements to be an eligible provider within the last twelve- (12) months? If not, reason for exception.
2. Do the courses of training offer the opportunity for a degree, certification or occupations skills recognized by employers if successfully completed?
3. Does the local board have systems in place for soliciting applications, accepting applications and determining provider eligibility?
4. Does the local board compile a list of local eligible providers, collect performance information and program cost information?

5. How is the Eligible training provider made available to individuals who have been determined eligible for training services?
6. In the One-Stop environment how is the Eligible Training Provider List made available to partner customers?
7. How does the local board and state entity collect performance information?
8. What procedures are in place to verify the accuracy of submitted performance information?
9. How does the State in cooperation with the local board remove programs that do not meet performance standards from the Eligible Training Provider List?
10. Does the local board require additional information, above State requirements, from training providers

## **Q. Additional Reviews and Alternate Reviews**

**(Additional Reviews and Alternate Reviews  
will be filled under the Heading Q.)**

*Part III*

*Examples of  
Monitor  
Worksheets  
with  
Plans*

## **A. Local Workforce Investment Board Monitor Plan**

**WIA 117**

**20 CFR 661**

**20CFR667**

**State WIA Policy**

**State Plan**

**Purpose:** Nebraska Department of Labor, Office of General Counsel Program Monitor will conduct a desk review of Local Workforce Investment Boards to examine compliance with the Workforce Investment Act (WIA) , it's implementing regulations and policies regarding agreements, board membership, appointment procedures and areas of representation, responsibilities and activities.

**Documents:** Documentation collected and examined within the course of review will include but not necessarily be limited to the following:

1. LWIB membership list
2. Agreements/by-laws
3. Certification
4. Minutes
5. Public Announcements
6. Oversight Activities/Plans
7. Local Plan
8. Schedules
9. Public Notifications
10. Nominations
11. Policies

**Interviews:** No interviews will be conducted.

**Questions:** The following questions will be addressed as a part of this review:

1. Does the local board composition meet the requirements of the law?
2. Does a written agreement exist between the chief elected official and the local board?
3. Does the local board conduct business in an open manner?



1. Has monitoring been conducted?
2. Are the youth council's monitoring responsibilities clearly defined?
3. Has youth monitoring been scheduled?
4. Has youth monitoring been conducted?
5. Has any corrective action been imposed against any contractor/sub-grantee or any provider of youth activities/
6. Does the local board monitor to assure their contractors/sub-grantees report on an accrual basis?
7. Does any contractor/sub-grantee incur situations involving program income?

If yes, describe how this is determined and handled:

**A. LOCAL WORKFORCE INVESTMENT BOARD  
MONITOR WORKSHEET**

Member: Name/Affiliation	Policy Making	Represents	Nominated By	APPOINTED BY:
			<p><u>A. BUSINESS:</u>  1. local business organization  OR  2. business Trade Association  <u>B. EDUCATION:</u>  1. Regional/Local Ed agencies, institutions  2. organizations representing Ed entities  <u>C. LABOR ORGANIZATIONS</u>  1. Local Area Labor Federations  OR  2. Other Representatives of Employees  (in areas where no employees are represented by unions)  <u>D. COMMUNITY BASED ORGANIZATIONS</u></p>	<p>A. CEO  B. CEO IDENTIFIED BY AGREEMENT OF CEOs  ALL LINCOLN WORKFORCE INVESTMENT AREA BOARD APPOINTED BY:</p>
2.			<p>APPLICATION: ____ Yes ____ No  Nominated by:  Board Member Address on Letter of Appointment:</p>	Notification on file:
3.				
4.				
5.				
6.				

## A. COMPOSITION OF BOARD WORKSHEET

<b>TOTAL BOARD MEMBERS:</b>	_____	<b>100%</b>	<b>REQUIRED</b>
• <b>BUSINESS</b>	_____	_____ %	<b>51%</b>
• <b>EDUCATIONAL ENTITIES</b>	_____		<b>2 SEATS</b>
*Special consideration: Community Colleges.			
• <b>LABOR ORGANIZATION</b>	_____		<b>2 SEATS</b>
(In areas in which employees are represented by labor organizations)			
• <b>OR</b>			
<b>OTHER REPRESENTATIVES</b>			
<b>OF EMPLOYEES</b>	_____		<b>2 SEATS</b>
(In areas in which no employees are represented by labor organizations)			
• <b>COMMUNITY BASED</b>			
<b>ORGANIZATIONS</b>	_____		<b>2 SEATS</b>
*Special consideration for representatives of individuals with disabilities, veterans for local in which organizations are present			
List:			
• <b>ECONOMIC DEVELOPMENT</b>			<b>2 SEATS</b>
1. <b>Public</b>	_____		
2. <b>Private</b>	_____		
*Special consideration of private sector economic development entities			
• <b>ONE STOP PARTNERS</b>	_____		
<b>Mandatory One Stop Partners Required:</b>			<b>1 SEAT EACH</b>
1. Title I WIA (Adults, Dislocated Workers, Youth, Job Corps)			
2. Native American Program			
3. Migrant and Seasonal Farmworkers			
4. Veterans workforce (WIA121(b)(1)(b)(ii) Job Service			
5. Employment Services			
6. Adult Education and Literacy			
7. Vocational Rehabilitation			
8. Welfare to Work			
9. Senior Community Service Employment Activities			
10. Postsecondary vocational education activities under Carl D Perkins			
11. Trade Adjustment Assistance (DOL)			
12. Local Veterans Employment Representatives and Disabled veterans outreach programs			
13. ET carried out Dept. Housing & Urban Development (HUD)			
14. Unemployment			
• <b>Other:</b>			
• <b>MAY INCLUDE OTHER INDIVIDUALS OR REPRESENTATIVES OF ENTITIES AS THE CEO IN THE LOCAL AREA MAY DETERMINE APPROPRIATE. ADDITIONAL:</b>			

### LOCAL BOARD NOMINATION PROCESS:

- \_\_\_ Developed nomination process consistent with law/  
 \_\_\_ Retain record of the process followed for soliciting nominations and the names of all candidates nominated and their qualifications

- **Board Chair:** \_\_\_\_\_ **BUSINESS:** \_\_\_\_\_

Local Board:

Date:

Monitor:

Revised 2/3/09

## **A. Local Investment Board**

### **1. IF MORE THAN ONE UNIT OF LOCAL GOVERNMENT:**

Agreement:

- Who appoints members of local board
- Who carries out any responsibilities assigned to such officials

### **2. CERTIFICATION:**

- Governor certified:  
Within two years?
- Written request for certification to DOL:  
Including: \_\_\_\_\_ Board member named,  
\_\_\_\_\_, Title  
\_\_\_\_\_, Business address \_\_\_\_\_  
\_\_\_\_\_ Description of the board member's functional employment responsibilities  
and qualifications to serve on board.  
\_\_\_\_\_ Affiliation  
\_\_\_\_\_ Term of Appointment  
(Beginning \_\_\_\_\_, 1999 to \_\_\_\_\_)  
\_\_\_\_\_ Indicated Board Officers  
\_\_\_\_\_ Statement indicating that a documented  
process was adopted and that records of the  
nomination/selection process are on file  
\_\_\_\_\_ CEO Agreement  
\_\_\_\_\_ Local Board bylaws (adopted, state board has copy on file,  
\_\_\_\_\_ include a conflict of interest clause

**B. One-Stop System Monitor Plan**  
**WIA121, 134**  
**20CFR662, 20CFR663**  
**State Workforce Investment Plan**  
**State WIA Policies**

**Purpose:** NDOL, Office of General Counsel Program Monitor will conduct onsite review of One-Stop operations to evaluate compliance with Workforce Investment Act (WIA), regulations and State policy. Areas of review will be characteristics, services, and the implementation of policies and procedures.

**Documents:** These documents will be examined as part of the review:

- MOU
- Outreach materials
- Written policies and procedures
- Customer Service Survey
- Performance Information
- Service Schedules (When services are available.)
- Local Area Plan

**Interviews:** Interviews will be conducted as necessary with:

- One-Stop Operating Entity designated staff
- Local Board Administrative staff

**Questions:** The following questions will be addressed in this review:

1. Does the local area have at least one certified physically comprehensive full-service one-stop?
2. Has the local board selected a one stop operator through a competitive process?
3. Does the local area one-stop system include supporting centers such as affiliated sites, networks of partners or specialized centers?
4. Does the comprehensive one-stop include all mandated partners with fully executed Memorandums of Understandings (MOU)?
5. Does the One-Stop have procedures in place to ensure that each partner contributes a fair share of the operating costs of the delivery system agreed upon through the MOUs?
6. Does the One-Stop system deliver core services and ensure availability Monday through Friday (minimum of 40 hours per week) as by State policy?
7. Does the One-Stop conduct outreach, intake and orientation to information and other services available through the system?
8. Does the One-Stop provide information on its performance record to customers and the interested general public?
9. Does the One-Stop have procedures in place to provide access to other activities and programs carried out under the partners authorizing laws?
10. Does the One-Stop provide integrated services including a single point of entry?
11. Does One-Stop include an accessible resource room which meets policy requirements?

## **B. One-Stop Monitor Interview**

**One-Stop Representative:** \_\_\_\_\_

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

**Date of Interview:** \_\_\_\_\_

<b>Does the One Stop:</b>	<b>Comments</b>
<b>1. Has the board certified the One-Stop?</b>	
<b>2. Are executed MOUs in effect?</b>	<b>**If yes, complete MOU Worksheet</b>
<b>2. Do Affiliated Sites support the One-Stop?</b>  If yes, type: <ul style="list-style-type: none"><li>• Network of affiliated sites that provide one or more partners' programs, services and activities</li><li>• Network of partners through which each partner provides services that are linked, physically or technologically, to an affiliated site that assures individuals are provided information on the availability of core services in local area</li><li>• Specialized centers that address specific needs (i.e. Dislocated Workers)</li></ul>	
<b>3. How does the one-stop provide access to a wide array of job seekers &amp; employment development services regardless of program eligibility?</b>	
<b>4. How does the One=Stop provide customer driven service allowing seekers and employers to select services appropriate to their individual needs at any location? (Centers should be flexible and sensitive to customer requirements and satisfaction)</b>	

<p><b>5. Describe how the One-Stop provides seamless service to the customer (integrates planning, design and service delivery across funding streams and programs. Reduced duplication of service provided to customer.)</b></p>	
<p><b>6. Has any specialized training been provided to staff?</b></p> <ul style="list-style-type: none"> <li>• Partner staff? (Cross training, information sharing, shared duties)</li> </ul>	
<p><b>7. What services are provided through technological access?</b></p> <p>(phone/Internet)</p>	
<p><b>8. How is information provided to the community?</b></p> <p>(outreach related to the One-Stop)</p>	
<p><b>9. How is the One-Stop organized to address customer need:</b></p> <ul style="list-style-type: none"> <li>• Labor market information</li> <li>• Common intake</li> <li>• Eligibility determination</li> <li>• Assessment of Needs</li> <li>• Case Management</li> <li>• Individual referral to education/skill training &amp; Supportive Service</li> </ul>	
<p><b>10. Does the One-Stop include a fully operational/accessible resource room</b></p> <p>Describe:</p>	
<p><b>11. Does the One-Stop have a single point of entry, shared by all partners?</b></p>	
<p><b>12. Does the One-Stop layout include an express desk to eliminate long lines?</b></p>	

<b>13. Does the On-Stop provide information related to the availability of supportive services including child care and transportation available in the local area?</b>  <b>How are referrals to those services accomplished?</b>	
<b>14. Are all required partners in the One-Stop:</b>	
a) Adult, DLW, Youth -WIA	
b) Employment & Training Programs, Veterans	
c) Indian & Native American Programs	
d) Migrant & Seasonal Farm Workers	
e) Job Corps	
f) Youth Opportunity Grants	
g) Employment Service	
h) Adult Based Ed & Literacy	
i) Post Secondary Voc Ed	
j) Vocational Rehabilitation	
k) Title V Of the Older American Act	
l) Trade Adjustment Act	
m) Community Services Block Grant	
n) HUS Employment and Training	
o) Unemployment Insurance	
<b>15. Are there non mandatory partners in the One-Stop? Do they have MOU's?</b>  <b>List:</b>	
<b>16. Describe core services available and who provides::</b>	
a.) Determination of eligibility WIA Title I	
b.) Outreach, intake, orientation	
c.) Initial Assessments	
d.) Job Search/Placement	
e.) LMI Information	



<b>f.) Training information:</b> <ul style="list-style-type: none"> <li>• Performance</li> <li>• Cost</li> <li>• Eligible Providers</li> </ul>	
<b>17. How do you provide assistance in establishing eligibility for Financial Aid assistance for training and education (Not WIA)</b>	
<b>18. How do you provide information on:</b> <ul style="list-style-type: none"> <li>• Local area performance</li> <li>• Filing UI claims</li> <li>• Availability of Supportive Service</li> <li>• Childcare</li> <li>• Transportation</li> </ul>	
<b>5. Describe assistance &amp; materials available in resource room:</b>	
<b>6. Describe how and hours available the following are provided:</b> <ul style="list-style-type: none"> <li>• Core Services</li> <li>• Intensive Services</li> <li>• Training Services</li> </ul>	

**Documentation Requested:**

- Certification of One-Stop
- MOUs
- Examples of Resource Room Materials
- Examples of Outreach/Informational Materials
- Most recent Customer Satisfaction Surveys completed
- Performance Information
- Outreach Materials
- Schedules of Workshops
- Assessment Materials
- Local Area Plan

**B. One Stop Checklist from Observation**

(if determined appropriate may be used as self-assessment by One-Stop Staff)

Does the One Stop include:	Yes	No	Comments
1. Does the One-Stop provide universal service?			
2. 40 hours per week service?			
3. Is information available on affiliated sites: <ul style="list-style-type: none"><li>• Network of affiliated sites that provide one or more partners' programs, services and activities</li><li>• Network of partners through which each partner provides services that are linked, physically or technologically, to an affiliated site that assures individuals are provided information on the availability of core services in local area</li><li>• Specialized centers that address specific needs (i.e. Dislocated Workers)</li></ul>			
4. Is universal service available:  All population groups have access to wide array of job seeking & employment development services regardless of program eligibility.			
7. Are employer services available?  <b>Describe:</b>			
8. Is there a single point of entry?			
9. Does the One-Stop have an express desk?			

10. Services provided by technology? (as reported in Trevor) <ul style="list-style-type: none"> <li>• _____</li> <li>• _____</li> </ul>			
11. Is common intake evident?			
12. Is labor market information evident?			
13. Is assessment of need available?			
14. Referral to education and skill training and supportive service?			
15. Multiple methods to provide information on accessing service?			
16. Is the location and physical layout convenient and easily accessible to all customers, including the disabled?			
17. Is site electronically connected to NWAS?			
18. Is a resource room evident? (Summary of contents, accessibility, staffing)			
19. Does the resource room have information available on supportive services available in the local area? Referrals to child care and/or transportation if needed?			
20. Does the resource room include:			
a.) Self-Help Modules			
Locally developed labor market Information and employment opportunities.			
Self-Assessment			

Software			
Books			
Videos			
Staff expertise			
Workshops			
b.) Job Search/Interviewing Same as examples above			
c.) Career Exploration General Occupation			
High Tech			
Business			
Environment			
Health Occupations			
Job Seeking Skills Workshops			
c.) Directories/General References Note:			
d.) School/Educational Information			
College Guides			
High School/GED Info			
e.) Other			
Newspapers			
Business Trade Magazines			
Self Direct Interests assessments Pen/paper & computerized			
Career & Job Search Videos			
Telephones/Fax Machine/Copier			
Personal Computers			

Word Processing Services			
Employer Listings			
Temporary employment opportunities			
Full Internet Connection			
f.) Consumer Reports			
g.) One-Stop Performance Information			
h.) Complaint & Grievance Procedures			
i.) Surveys for feedback			
j.) Employment Statistics.			

3/11/09

**B. One-Stop System**  
**MOU Worksheet**

***I. What form of MOU was chosen:***

1. Single "Umbrella" MOU that addresses the issues relating to the local One-Stop Delivery System for the local board and all partners  

YES
NO
- or**
2. Separate agreements between the local board and one or more partners  

YES
NO

If multiple agreements, list:

*\*With either situation, MOU must clearly identify services delivered and each partner must contribute to the One-Stop System.*

**II. Contents:** Each MOU shall contain a brief narrative explanation of the Local WIB'S vision of the One-Stop, including the following:

	YES	NO
1. Services to be provided through the One-Stop delivery system	<input type="checkbox"/>	<input type="checkbox"/>
♦ Explanation of the core	<input type="checkbox"/>	<input type="checkbox"/>
♦ Intensive	<input type="checkbox"/>	<input type="checkbox"/>
♦ Training	<input type="checkbox"/>	<input type="checkbox"/>
♦ Other Services	<input type="checkbox"/>	<input type="checkbox"/>
♦ Services to be delivered at least one comprehensive physical location in local area	<input type="checkbox"/>	<input type="checkbox"/>
♦ Specify partners delivering services	<input type="checkbox"/>	<input type="checkbox"/>
♦ One-Stop system to provide access to the partners' other Activities and programs (Must be described in the MOU to ensure seamless, comprehensive Workforce Development System)	<input type="checkbox"/>	<input type="checkbox"/>
♦ Core services at center by One-Stop partner supplemented by the provision of services through network	<input type="checkbox"/>	<input type="checkbox"/>

2. How the costs of such services and operating cost of the system will be funded		
◆ Particular funding arrangements for services and operating cost of One-Stop delivery system		
◆ Each partner contributes fair share		
◆ System for provision of core services at the One-Stop must be proportionate to the use of the services by the individuals attributed to partner's program.		
Must consider:		
A.) Individual's referred through the comprehensive One-Stop Center and enrolled in the partner's program after receipt of core services		
B.) Individuals enrolled in the partner's program prior to receipt of applicable core service at the center		
C.) Individuals who meet the eligibility criteria for the partner's program and who receive an applicable core service		
D.) Individuals who meet an alternative definition described in MOU		
◆ Identification of the method to be used to allocate the cost of service operating costs, along with a detailed description of payment system and identification of the cost sharing methods for all partners.		
2. Methods for referral of individuals between the One-Stop Operator and the One-Stop partners, for the appropriate services and activities:		
◆ Explain systematic approach of the referral of individuals Needing One-stop services.		
A.) Agreed upon by all partners		
B.) Thoroughly explained		
C.) Describe services available at the One-Stop site, along with those services provided at alternative locations and thoroughly explain how the referral process will connect customers to the services.		
D.) Describe who will provide the:		
Intake		
Enrollment		
Assessment		
How initial referral for services takes place		
◆ Describe how is system advantageous to customer:		

- ♦ Describe what follow-up action will be taken [ ] [ ]
3. The duration of the MOU and the procedures for amending the memorandum during the term of agreement. [ ] [ ]
- ♦ Timeframe for withdrawal [ ] [ ]
  - ♦ Resolution Process [ ] [ ]
  - ♦ Signatory processes [ ] [ ]
4. Local Area Plan: Are the MOU's consistent with the one stop system as described in the local area plan? [ ] [ ]

3/11/09



## **C. Adult/Dislocated Worker Eligibility Monitor Plan**

**WIA 101, 122, 134, 189**

**20CFR663**

**20CFR667**

**State WIA Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel monitor will conduct comprehensive oversight of Workforce Investment Act (WIA) Adult and Dislocated Worker Programs. The purpose of the oversight activities will be to determine whether programs are being operated in accord with the provisions of the Workforce Investment Act, WIA regulations, State policies and the provisions of the Local Workforce Investment Boards. The following areas will be scrutinized as a part of this review:

- Outreach
- Registration Process
- Assessment Process
- Eligibility and Priority determination and documentation process
- Supportive Service determination
- ITA process and documentation

**Documents:** These documents will be examined as a part of this review:

- Participant Records
- Assessments
- Eligibility Documentation
- Supportive Service records
- Individual Employment Plan

**Interviews:** Formal interviews with director or designated staff.

**Questions:** The following questions will be addressed:

1. Does the local area conduct outreach and recruitment to reach targeted populations?
2. Does the local area have a registration process in place that assures registration is completed prior to intensive services?
3. Does the local area assess individuals for skill levels, abilities and supportive service needs?
4. Does the local area provide supportive service as necessary while ensuring that support is not available elsewhere?
5. Does the local area have a process in place to document a "Determination of Need" has been made?
6. Does the local area determine and document eligibility and priority selection?
7. Does the local area maintain and retain documents and records and make them available as required?

**C. DLW/ADULT ELIGIBILITY REVIEW**  
**INTERVIEW WITH ADMINISTRATION**  
**QUESTIONS**

Worksheet  
example

INTERVIEW WITH: \_\_\_\_\_

Date: \_\_\_\_\_

1. What process is currently being used for outreach?
    - Targeted and special populations?
  2. Describe orientation procedures for applicants.
  3. Describe the local areas registration policy
    - When are applicants registered?
    - What records are kept for applicants who are not eligible?
  4. Is there a requirement for standardized eligibility documentation?
  5. What process is being used to document the determination of need for intensive or training services?
    - Where is it recorded?
    - Who determines?
    - What is taken into consideration is it recorded in the file?
  6. Describe supportive service procedure:
    - How is need determined?
    - What is it based on?
    - Who has authority?
- How coordination with other sources is available documented?

**COPIES TO REQUEST:**

1. Outreach Materials
2. Orientation Materials
3. Supportive Service Forms

## C. Eligibility Adult/Dislocated Worker

### Adult Eligibility Worksheet

NAME SOCIAL SEC# ADDRESS	DATES: 1. Ap 2. NWAS 3. TREX	ELIGIBILITY: Citizenship/ Work Eligible (Verified)	Selective Service (Verif.d)	Age (DOB 18 or over) DOB: (Verif.)	Receive d Core Service	Determination of Need 1. Intensive 2. Training (describe)	PRIORITY: ✓ Low Income (Verif.)	✓ Family Size (Verifi.)	✓ Public Assistance (Verified)	RECEIVED ✓ Assess -ments (List)	✓ EO is the Law Notice	✓ IEP
1.												
2.												
3.												
4.												
5.												
6.												
7.												

worksheet  
example

8.												
----	--	--	--	--	--	--	--	--	--	--	--	--

**Notes:**



## DISLOCATED WORKER ELIGIBILITY CHECKLIST

worksheet  
example

**Category 1: Laid off and unlikely to return to previous industry or occupation.**

- Category 2: Lay off due to permanent closure or substantial lay off.

- ### Category 3: Self-Employed

- #### Category 4: Displaced Homemaker

- 71





## **D. Youth Program, Youth Eligibility Plan**

(See E. Part 2, *Youth Eligibility Review Plan and Worksheet*)

**WIA Sec. 101 and 189**

**20 CFR 664**

**State Plan**

**State Policy**

**Background:** This review may be a separate review or may be included in the Youth Program Review.

**Limitations:** This review will be limited to eligibility and assessment necessary for eligibility determination.

**Purpose:** To review the Youth Eligibility determination process for compliance to law, regulation, and policy.

**Documents:** The following documents will be examined as a part of the review.

1. The Local Board's service plan
2. Local Board records including Youth Council records
3. Youth Program evaluation plans and procedures
4. Management Information System Records
5. Participant records and eligibility determination procedures

**Question:** These questions will be addressed.

1. Does the Local Area have a system determine and document participant eligibility?
2. Does the Local Area ensure participants are assessed to determine if they are deficient in basic literacy skills?
3. Does the Local Area have a policy to define "requires additional assistance to complete an educational program or to secure and hold employment" included in the local plan?
4. Are concurrent youth eligible for both the youth program and for the adult or dislocated worker program?

**Youth Eligibility-Worksheet E. Part 2, WIA Section (101) WIA Regulations 664**

**All registrants must meet the requirements of part A  
and either Part B or Part C to be eligible for youth services**

**Name** \_\_\_\_\_

**Residence** \_\_\_\_\_

**Part A General Requirements** \_\_\_\_\_ Documentation

- |                                   |    |
|-----------------------------------|----|
| 1. Age (14 through 21)            | 1. |
| 2. Selective Service (as applies) | 2. |
| 3. Work eligible                  | 3. |

**Part B Low income and one barrier in the B category** \_\_\_\_\_ Documentation

- |               |    |
|---------------|----|
| 1. Low income | 1. |
|---------------|----|

**Part B Categories** \_\_\_\_\_ Documentation

- |  |    |
|--|----|
| 1. Deficient in basic literary skills  | 1. |
| 2. School dropout  | 2. |
| 3. Homeless, runaway, foster child   | 3. |
| 4. Pregnant or parenting   | 4. |
| 5. Offender  | 5. |
| 6. Individual (including youth with disability) who requires additional assistance to complete an educational program or to secure and hold employment | 6. |

**Part C: WIB Approval and one barrier in the C category** \_\_\_\_\_ Documentation

- |                 |    |
|-----------------|----|
| 1. WIB Approval | 1. |
|-----------------|----|

**Barrier requirement for one (or more) category** \_\_\_\_\_ Documentation

- |  |    |
|--|----|
| 1. School dropout  | 1. |
| 2. Basic skills deficient, as defined in WIA section 101(4)                                  | 2. |
| 3. one or more grade levels below the grade level appropriate to the individual's age        | 3. |
| 4. Pregnant or parenting   | 4. |
| 5. Possess one or more disabilities, including learning disabilities                         | 5. |
| 6. Homeless or runaway   | 6. |
| 7. Offender  | 7. |
| 8. Face, serious barriers to employment as identified by the Local board. (WIA sec. 129 (c)) | 8. |

<b><u>Eligibility:</u></b>	<b><u>Is the individual documented as eligible?</u></b>	<b>Yes</b>	<b>No</b>	_____ Check if
available in file:				
Assessment: _____	Goal/Plan _____	Other _____		
Monitor: _____		Date: _____		

**E.** Youth Program, Part 1, Youth Council Review Plan  
WIA Section Sec. 117 & 123  
20 CFR 661.335  
20 CFR 661.340  
20CFR664.100-110  
Legislative Gill 193  
State Law  
State WIA Policy

**Purpose:** To review the Youth Council requirements including membership and responsibilities.

**Documents:** The following documents will be examined as a part of the review.

1. The local board's service plan
2. Youth Council membership and area of affiliation list
3. Meeting minutes or/and notice of meetings
4. Monitor and evaluation plans or procedures
5. Schedules
6. Oversight Activities
7. Minutes

**Interviews:** This review will include interviews of local area staff, service contractors and providers.

**Questions:** These questions will be addressed.

1. Does the Local Board's Youth Council meet the membership requirements of WIA?
2. Does the Youth Council hold meetings and provide input to the local board?
3. Does the Youth Council coordinate youth activities in the local area?
4. Does Youth Council provide oversight, monitoring and evaluation of the delivery of services to youth?
5. Has the Youth Council been authorized by the chairperson of the local board to carry out other duties? If so what are these duties?

**E. Youth Program, Part 1, Youth Council – Membership – Responsibilities**  
**Worksheet**  
**20 CFR 661.335**

1. a)

1. Has the Youth Council been established under the local board?

*Describe:*

2. b)

Does the membership of the Youth Council meet the WIA requirements?

1. Name Local Board Members who have special interest or expertise in youth policy and their affiliation.

2. Name the members who represent service agencies and their affiliation.

Cont.

**E. Youth Program, Part 1, Youth Council – Membership – Responsibilities  
Worksheet  
20 CFR 661.335**

3. Name members who represent local public housing authorities and their affiliation.
  
  4. Name parents of eligible youth seeking assistance under subtitle B of title I of WIA. (explain how these parents are chosen)
  
  5. Name individuals representing organizations with experience relating to youth activities.
- 
3. c) Has the Chairperson of the local board with the Chief Elected Official selected other persons to be on the Youth Council?
  
  4. d) Only local board members that are also Youth Council members are allowed to vote with the board. What process does the Youth Council use to advise the board and carry out its responsibilities including oversight, program development, recommendation of eligible youth providers and other duties?



**E. Youth Program, Part 2, Youth Eligibility Review Plan and Worksheet**  
**WIA Sec. 101 and 189**  
**20 CFR 664**  
**State Plan**  
**State Policy**

**Background:** This review may be a separate review or may be included in the Youth Program Review.

**Limitations:** This review will be limited to eligibility and assessment necessary for eligibility determination.

**Purpose:** To review the Youth Eligibility determination process for compliance to law, regulation, and policy.

**Documents:** The following documents will be examined as a part of the review.

1. The Local Board's service plan
2. Local Board records including Youth Council records
3. Youth Program evaluation plans and procedures
4. Management Information System Records
5. Participant records and eligibility determination procedures

**Question:** These questions will be addressed.

1. Does the Local Area have a system determine and document participant eligibility?
2. Does the Local Area ensure participant are assessed to determine if they are deficient in basic literacy skills?
3. Does the Local Area have a policy to define "requires additional assistance to complete an educational program or to secure and hold employment" included in the local plan?
4. Are concurrent youth eligible for both the youth program and for the adult or dislocated worker program?

**Youth Eligibility-Worksheet E. Part 2, WIA Section (101) WIA Regulations 664**

**All registrants must meet the requirements of part A  
and either Part B or Part C to be eligible for youth services**

**Name** \_\_\_\_\_

**Residence** \_\_\_\_\_

**Part A General Requirements** \_\_\_\_\_ Documentation

- |                                   |    |
|-----------------------------------|----|
| 1. Age (14 through 21)            | 1. |
| 2. Selective Service (as applies) | 2. |
| 3. Work eligible                  | 3. |

**Part B Low income and one barrier in the B category** \_\_\_\_\_ Documentation

- |               |    |
|---------------|----|
| 1. Low income | 1. |
|---------------|----|

**Part B Categories** \_\_\_\_\_ Documentation

- |  |    |
|--|----|
| 1. Deficient in basic literary skills  | 1. |
| 2. School dropout  | 2. |
| 3. Homeless, runaway, foster child   | 3. |
| 4. Pregnant or parenting   | 4. |
| 5. Offender  | 5. |
| 6. Individual (including youth with disability) who requires additional assistance to complete an educational program or to secure and hold employment | 6. |

**Part C: WIB Approval and one barrier in the C category** \_\_\_\_\_ Documentation

- |                 |    |
|-----------------|----|
| 1. WIB Approval | 1. |
|-----------------|----|

**Barrier requirement for one (or more) category** \_\_\_\_\_ Documentation

- |  |    |
|--|----|
| 1. School dropout  | 1. |
| 2. Basic skills deficient, as defined in WIA section 101(4)                                  | 2. |
| 3. one or more grade levels below the grade level appropriate to the individual's age        | 3. |
| 4. Pregnant or parenting   | 4. |
| 5. Possess one or more disabilities, including learning disabilities                         | 5. |
| 6. Homeless or runaway   | 6. |
| 7. Offender  | 7. |
| 8. Face, serious barriers to employment as identified by the Local board. (WIA sec. 129 (c)) | 8. |

<b><u>Eligibility:</u></b>	<b><u>Is the individual documented as eligible?</u></b>	<b>Yes</b>	<b>No</b>	_____ Check if
available in file:				
Assessment: _____	Goal/Plan _____	Other _____		
Monitor: _____		Date: _____		



**E. Youth Program, Part 3, Out of School Youth Plan and Worksheet**  
**WIA Sec. 101 and 129**  
**20 CFR 664.300, 664.310, 664.320**  
**State Plan**  
**State Policy**

**Purpose:** To review the systems used to identify and track out of school youth to ensure at least 30% (less allowed administrative expenditures) of funds allocated for youth are expended for individuals that are eligible under the Out of School Youth category.

**Documents:** The following documents may be examined as a part of the review.

1. The Local Board's Service Plan.
2. Management Information Systems Records
3. Service Provider Records
4. Financial Records
5. Participant records

**Interviews:** Interviews may be required depending on the design of the systems.

**Questions:** These questions will be addressed.

1. Does the State have a waiver on youth funds?
2. Does the Local Area ensure individuals are determined and documented eligible for participation in the Out of School category?
3. Does the Local Area ensure the expenditure of no less than 30% of allocated youth funds are spent on Out of School youth?
4. Does the Local Area ensure records are retained and maintained for the required time?

## **E. Youth Program, Part 3, Out of School Youth Plan and Worksheet Worksheet**

1. What system is used to determine and document eligibility?  
*Explain:*
  
2. What system is used to track expenditures?  
*Explain:*
  
3. What system is used to ensure the expenditure of at least 30% of allocated youth funds are spent on Out of School Youth?  
*Explain:*
  
4. What controls are in place to ensure the retention of records for the required time?  
*Explain:*

**E. Youth Program, Part 4 (i) Youth Program Design Plan  
Elements, and Parameters  
WIA Section 129, 134, 136, 169  
20 CFR 400  
State Workforce Investment Plan  
State Policy**

**Purpose:** Review the design and delivery of the youth program.

**Limitation:** This review (Part 4) is divided into seven sections, i-vii, because of the number of records and the complexity of the services provided. All 7 sections will be reviewed during the year and a report will be issued for each section of Part 4 either separately or as one report. The information from the Plans and Worksheet for the Part 4 (i) to Part 4 (vii) will be used to answer the questions in Plan 4.

**Documents:** These documents will be examined as a part of the review.

1. State Plan
2. Local Area Plan
3. Contracts, agreements or similar records
4. Participant Records
5. Records of service availability and delivery
6. Management information systems records

**Interviews:** This review will include interviews.

**Questions:**

1. Does the Local youth program design and delivery adequate to meet requirements in the following areas?
  - a) Assessment
  - b) Individual service strategies, career goals
  - c) Preparation for postsecondary education and employment, linkages
  - d) Provision of Intake, objective assessment, ISS
  - e) Program elements
  - f) Board linkages
  - g) Income eligible youth referral
  - h) Eligible youth (basic skills or training needs) referral
  - i) Inclusion of youth, youth parents, youth leaders in planning programs
  - j) Board use of objective assessments from other programs

**E. Youth Program, Part 4 (i)**  
**Worksheet 664.405**  
**Insert 664.410 (elements)**  
**Youth Program Design**

**Yes    No    Local Area** \_\_\_\_\_

☐    ☐    (a) Does the Local youth program meet the requirements of the regulations?

- |                          |                          |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | (1) Provide an objective assessment of each youth participant |
| <input type="checkbox"/> | <input type="checkbox"/> | (1) include a review of the academic skill level              |
| <input type="checkbox"/> | <input type="checkbox"/> | (1) include a review of occupational skill level              |
| <input type="checkbox"/> | <input type="checkbox"/> | (1) service need  |

*Describe:*

- |                          |                          |  |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | (2) Develop individual service strategies for each youth participant |
|                          |                          | (2) identify an age age-appropriate career goal                      |
|                          |                          | (2) using the results of the assessment                              |

*Describe:*

- |                          |                          |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | (3) Provide preparation for postsecondary education opportunities                               |
| <input type="checkbox"/> | <input type="checkbox"/> | (3) Provide linkages between academic and occupational learning                                 |
| <input type="checkbox"/> | <input type="checkbox"/> | (3) Provide preparation for employment  |
| <input type="checkbox"/> | <input type="checkbox"/> | (3) Provide connections to intermediary organization that links to the job market and employers |

*Describe:*

- |                          |                          |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | (4) Does the grant recipient/fiscal agent provide intake, objective assessment and the development of individual service strategy |
|--------------------------|--------------------------|---|

- |                          |                          |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | (4) If not, was the contract to provide these service competitively let |
|                          |                          | Explain   |

*Describe:*

- |                          |                          |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | (b) Does the plan explain how the 10 youth program elements are provided? |
|--------------------------|--------------------------|---|

## E. Youth Program **Part 4 (i) Insert**

### Worksheet Elements

664.410

Directions: Use this worksheet to determine if the Local Area is delivering the elements to participants.

**Yes    No**

- |                          |                          |  |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | (1) Tutoring   |
| <input type="checkbox"/> | <input type="checkbox"/> | (1) Study Skills training  |
| <input type="checkbox"/> | <input type="checkbox"/> | (1) Instruction leading to secondary school completion (including dropout prevention strategies) |
|                          |                          | <i>Describe:</i>   |
|                          |                          |  |
| <input type="checkbox"/> | <input type="checkbox"/> | (2) Alternative secondary school offerings   |
|                          |                          | <i>Describe:</i>   |
|                          |                          |  |
| <input type="checkbox"/> | <input type="checkbox"/> | (3) Summer employment opportunities linked to academic and occupational learning                 |
|                          |                          | <i>Describe:</i>   |
|                          |                          |  |
| <input type="checkbox"/> | <input type="checkbox"/> | (4) Paid and unpaid work experience including internships and job shadowing                      |
|                          |                          | <i>Describe:</i>   |
|                          |                          |  |
| <input type="checkbox"/> | <input type="checkbox"/> | (5) Occupational skills training   |
|                          |                          | <i>Describe:</i>   |
|                          |                          |  |
| <input type="checkbox"/> | <input type="checkbox"/> | (6) leadership development opportunities   |
| <input type="checkbox"/> | <input type="checkbox"/> | -community service   |
| <input type="checkbox"/> | <input type="checkbox"/> | -peer-centered activities  |
|                          |                          | <i>Describe:</i>   |

**664.410 ( cont. )**

☐ ☐ (7) Supportive services

- ☐ ☐ (a) Link to community serves  
☐ ☐ (b) Assistants with transportation  
☐ ☐ (c) Assistance with child care and dependent care  
☐ ☐ (d) Assistance with housing  
☐ ☐ (e) Referrals to medical services  
☐ ☐ (f) Assistance with uniforms or work attire and work related tools including eye glasses and protective eye gear  
*Describe:*

☐ ☐ (8) Adult mentoring for at least 12 months (during and/or after) Program participation  
*Describe:*

☐ ☐ (9)(a) Follow-up services *may* include:

- ☐ ☐ (1) Leadership Development  
☐ ☐ -Exposure to post secondary Educational opportunities  
☐ ☐ -Community and service learning projects  
☐ ☐ -Peer-centered activities(including peer mentoring and tutoring)  
☐ ☐ -Organizational and team work training  
☐ ☐ -Training in decision-making (including determining priorities  
☐ ☐ -Citizenship training including parenting, work behavior training and budgeting of resources.  
  
☐ ☐ -linkages to community services  
☐ ☐ -Assistance with child care and dependent care  
☐ ☐ -Assistance with housing  
☐ ☐ -Referrals to medical services  
☐ ☐ -Assistance with uniforms or work attire and work related tools such as eye glasses and protective eye gear

**664.410 ( cont. )**

**Yes    No**

- |                          |                          |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | (2) -Regular contact with a youth participant's employer including assistance in addressing work-related problems |
| <input type="checkbox"/> | <input type="checkbox"/> | (3) -Assistance in securing better paying jobs, career development and further education                          |
| <input type="checkbox"/> | <input type="checkbox"/> | (4) -Work related peer support groups   |
| <input type="checkbox"/> | <input type="checkbox"/> | (5) -Adult mentoring  |
| <input type="checkbox"/> | <input type="checkbox"/> | (6) -Tracking the progress of youth in employment after training  |
| <input type="checkbox"/> | <input type="checkbox"/> | (9)(b) Do all participants receive some form of follow-up service<br><i>Describe:</i>                             |

Explain: What criteria are used to decide what supportive service and how long that supportive service will be continued for each participant?

Does the State or Local board have a method to extend follow-up service s beyond 12 months? If so explain the process.

- |                          |                          |  |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | (10) Comprehensive guidance and counseling including drug and alcohol abuse counseling as well as referrals to counseling as appropriate to the need of individual youth |
| <input type="checkbox"/> | <input type="checkbox"/> | (b) Explain how the participant's objective assessment and individual service strategy are used to by the local program to determine specific program services           |

**664.405 ( cont. )**

- ☐ ☐ (c) Does the board provide links with entities to eligible youth
- ☐ ☐ (1) Justice and law enforcement
- ☐ ☐ (2) Public housing authorities
- ☐ ☐ (3) Local educational agencies
- ☐ ☐ (4) Job Corp representatives
- ☐ ☐ (5) Representatives of other youth programs including homeless youth and other programs both public and private

*Describe:*

- ☐ ☐ (d) Are income eligible youth referred to the appropriate services
- ☐ ☐ (1) Information on the full array services through the Local Board, eligible providers or One-Stop partners
- ☐ ☐ (2) Refer to training and educational programs who can serve them concurrently or sequentially

*Describe:*

- ☐ ☐ (e) Are eligible youth that need basic skills or training but do not meet enrollment requirements of the provider or program referred
- ☐ ☐ (1) For further assessment
- ☐ ☐ (2) training and educational programs

*Describe:*

- ☐ ☐ (f) Do Local Board include parents, youth participants and community youth organization leaders in the design and implementation of the youth program?

*Describe:*

- ☐ ☐ (g) Does the program provider use other objective assessment or individual service strategy developed under another education or training program?

**Does the local area program meet the requirements of the regulations?**

**Is corrective action required?**

Monitor Signature \_\_\_\_\_  
Date \_\_\_\_\_



**E. Youth Program, Part 4 (ii) Youth Program Design Plan  
Elements, and Parameters  
Administration, Oversight and Reporting  
WIA Section 129, 134, 136, 169  
20 CFR 400  
State Workforce Investment Plan  
State Policy**

**Purpose:** To review the Local Area's procedures for reviewing administration, oversight and reporting to the State on information and data for the Youth Program.

**Documents:** These documents will be examined as a part of the review.

1. State Plan
2. Local Area Plan
3. Contracts, agreements or similar records
4. Participant Records
5. Records of service availability and delivery
6. Management information systems records

**Interviews:** This review may include interviews.

**Questions:**

1. Does the Local Area monitor participant and budget data to ensure the participant numbers and budget numbers are meeting plan expectations?
2. What system does the Local Area use to ensure accurate and timely oversight and reporting of the Youth Program budget and participant data? (Include a description of the system to identify and correct and discrepancy between plan expectations and actual data including the submission of revised plans to the state).

**E. Youth Program, Part 4, (ii) Program Design, Elements, and Parameters  
Worksheet Administration, Oversight and Reporting**

This sheet is an information sheet to compare the Local Area's Budget Plan for expenditures the Local Area's expenditures as reported to the state.

A difference of more than ten % between the planned budget and the reported expenditures may indicate a need for additional monitoring or a revision of the Local Areas plans.

**Expenditures**

Period	Planned	Reported	Difference
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

The Local Area's Planned Participation compared to reported participation.

**Participants**

Period	Planned	Reported	Difference
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**Expenditures**

1. Is the difference between the budget and actual reported expenditures within 10% of the planned amount?

2. If the difference is more then 10% has the board submitted a revise plan?  
(Modification to the plan)

3. If the Board has not submitted a revised plan, describe what oversight has been completed and what action is being taken to assure the Local Area will meet its planned budget goals?

### **Participant Numbers**

4. Is the difference between the planned participant number and the actual reported participant number within 10% of the planned amount?

5. If the difference is more than 10% has the board submitted a revised plan?  
(Modification to the plan)

6. If the Board has not submitted a revised plan, describe what oversight has been completed and what action is being taken to assure the Local Area will meet its planned participant goals?

**E. Youth Program Part 4 (iii) Worksheet**  
**Management Information System**  
**Younger Youth (Goals)**

**Purpose:** To ensure the Local Area develops younger youth goals and enters the goals into the Management Information System.

**Documents:** These documents will be examined in this review.

**Interviews:** This review may include interviews.

**Questions:** These questions will be addressed.

1. Does the information on the MIS form agree with the information in the participant file?
2. Are math and reading evaluation instruments adequate to meet WIA requirements?
3. Is the system to identify and document goals and evaluate supportive service adequate to meet WIA requirements?
4. Is the goal data entered in to the MIS system promptly?

**E. Youth Program Part 4 (iii) Worksheet**  
**Management Information System**  
**Younger Youth (Goals)**

**Comparison information of forms to information in participants files.**

**Younger Youth**

1. Does information on the enrollment form agree with the information in the file?
2. What evaluation instruments are used to determine math and reading level?
3. What goals were identified?
4. What documentation is planned to demonstrate the completion of the goal?
5. Describe how goals are set?
6. Explain the process for entering the goal into the system?  
  
Was first goal entered into the Management Information System on the proper date?  
  
Are goals updated promptly?  
  
Documented in the file?
7. Was a supportive service evaluation done?  
Was it updated promptly?

Monitor \_\_\_\_\_  
Date \_\_\_\_\_

**E. Youth Program, Part 4 (iv)**  
**Leadership Services for Youth Plan 20 CFR 664**  
**Positive Social Behaviors for Youth Plan 20 CFR 664**

**Purpose:** To determine what leadership service are offered to Youth.

**Documents:** These documents will be examined as a part if the review.

1. State Plan
2. Local Area Plan
3. Participant files
4. Provider contracts and similar records.

**Interviews:** This review may require interviews:

**Questions:**

1. What leadership services are provided for Youth?
2. What process is used to determine who will participate in various leadership activities?
3. What positive social behavior activities are provided for Youth?
4. What process is used to determine who will participate in social behavior activities?

**E. Youth Program, Part 4 (iv)**  
**Worksheet Leadership Services for Youth**  
**Worksheet Positive Behavior Activities**  
**20 CFR 664**

WIA allows the following services for youth.  
Check the services provided by the Local Area and describe how the service is provided.

**Leadership Services**

1. Leadership development service activities

\_\_\_\_\_ Exposure to postsecondary education  
Describe:

\_\_\_\_\_ Community/service learning projects  
Describe:

\_\_\_\_\_ Peer mentoring and tutoring  
Describe:

\_\_\_\_\_ Organizational and team work training  
Describe:

\_\_\_\_\_ Training in decision making  
Describe:

\_\_\_\_\_ Citizenship training (life skills, parenting, budgeting)  
Describe:

## Positive Social Behaviors

\_\_\_\_\_ Positive attitudinal development  
Describe:

\_\_\_\_\_ Self esteem building  
Describe:

\_\_\_\_\_ Openness to working with people of diverse racial and ethnic  
backgrounds  
Describe:

\_\_\_\_\_ Health lifestyles  
Describe:

\_\_\_\_\_ Positive relationships with adults, peers and  
community (ex. voting)  
Describe:

\_\_\_\_\_ Commitment to learning and academic success  
Describe:

\_\_\_\_\_ Avoiding delinquency:  
Describe:

\_\_\_\_\_ Postponed and responsible parenting  
Describe:

\_\_\_\_\_ Positive job attitudes and work skills  
Describe:



**E. Youth Program, Part 4, (v) Youth Supportive Service Plan**  
**WIA Sec. 101, 129**  
**20 CFR 664.400**

**Purpose:** Review the determination and delivery of youth supportive services by examining records of the following areas:

1. Supportive Services provided in the Local Area.
2. Supportive Services for Younger Youth.
3. Supportive Services for Older Youth.
4. Determination and documentation of need.
5. Coordination of groups that will deliver services.
6. Financial tracking of supportive services costs
7. Maintenance of Records

**Documents:** These documents will be examined as a part of the review.

1. The Local Board's Service Plan
2. Contracts, agreement, or similar records
3. Participant records
4. Records of service availability and delivery
5. Management information records

**Interviews:** This review will may include interviews.

**Question:** These questions will be addressed?

1. What services are available?
2. How are services needs determined and documented?
3. How is coordination achieved between groups that deliver services?
4. How is cost tracked for fiscal purposes?
5. Are records available and maintained for the required times?

**E. Youth Program, Part 4, (v) Youth Supportive Service Review Worksheet**  
**WIA Sec. 101, 129**  
**20 CFR 664.440**

**Sec. 20 CFR 664.440** What are supportive services for youth?

Supportive Services for youth, as defined in WIA section 201 (46), may include the following:

- (a) Linkages to community services;
- (b) Assistance with transportation;
- (c) Assistance with child care and dependent care;
- (d) Assistance with housing;
- (e) Referrals to medical services; and
- (f) Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear. (WIA sec, (c) (2) (G))

1. What supportive service does the local area offer to younger youth?

Describe:

\_\_\_Linkages

\_\_\_Transportation

\_\_\_Child care and dependent care

\_\_\_Housing

\_\_\_Medical referral

\_\_\_Uniforms, eye glasses etc. for work

2. What supportive service does the local area offer to older youth?

Describe:

\_\_\_Linkages

\_\_\_Transportation

\_\_\_Child care and dependent care

\_\_\_Housing

\_\_\_Medical referral

\_\_\_Uniforms, eye glasses, etc. for work

3. How is the need for supportive services documented in the youth's file?

**E. Youth Program Part 4 (v)**  
**Youth Supportive Service Review Worksheet**  
**WIA Sec. 101, 129**  
**20 CFR 664.440**

4. Who will deliver these services?
  
  
  
  
  
5. If coordination between groups is needed, how is this coordination achieved?
  
  
  
  
  
6. How is the cost of the supportive service tracked for fiscal purposes?
  
  
  
  
  
7. Are records available and maintained for the required time? Who is the responsible person and where will the record be located?

**E. Youth Program Part 4 (vi)**  
**Follow-up Service for Youth Plan**  
**664.450**

**Background:** Follow-up services may include leadership and supportive services allowed by WIA. Every youth must receive some form of follow-up service for 12 months. The follow-up service must be determined based on the needs of the individual. Those youth that participated in summer youth employment opportunities may be offered less intensive services.

**Purpose:** To ensure the Local Area provides follow-up service determined on participant need and for the required 12 months after exit from the program.

**Documents:** These documents will be examined as a part of the review.

1. State Plan
2. Local Plan
3. Provider Contracts or agreements
4. Management Information records
5. Participant files
6. Reporting records and documentation

**Questions:**

1. Does the Local Area provide WIA leadership development activities as follow-up services?
2. Does the Local Area provide WIA supportive service as follow-up services?
3. Does the Local Area provide contact with a youth's employer?
4. Does the Local Area provide assistance with better jobs, career development and further education?
5. Does the Local Area provide work-related peer support groups?
6. Does the Local Area provide adult mentoring?
7. Does the Local Area track the progress of youth in employment after training?
8. Does the Local Area evaluate and determine follow-up service based on the needs of the individual?
9. What follow-up services are available to youth that have participated in only summer employment opportunities?

## **E. Youth Program Part 4 (vi)**

### **Worksheet Follow-up Service for Youth**

**664.450**

#### **1. Leadership Development Services (Follow-up)**

##### **1. Leadership development service activities**

\_\_\_\_\_ Exposure to postsecondary education  
Describe:

\_\_\_\_\_ Community/service learning projects  
Describe:

\_\_\_\_\_ Peer mentoring and tutoring  
Describe:

\_\_\_\_\_ Organizational and team work training  
Describe:

\_\_\_\_\_ Training in decision making  
Describe:

\_\_\_\_\_ Citizenship training (life skills, parenting, budgeting)  
Describe:

#### **Supportive Service (Follow –up)**

##### **1. Younger youth**

Describe:

\_\_\_\_\_ Linkages

\_\_\_\_\_ Transportation

\_\_\_\_\_ Child care and dependent care

\_\_\_\_\_ Housing

\_\_\_\_\_ Medical referral

\_\_\_\_\_ Uniforms, eye glasses etc. for work

1. Older youth

Describe

\_\_\_Linkages

\_\_\_Transportation

\_\_\_Child care and dependent care

\_\_\_Housing

\_\_\_Medical referral

\_\_\_Uniforms, eye glasses, etc. for work

### **Regular contact with youth's employer**

2. \_\_\_Regular contact with the youth's employer and assistance with work related problems

Describe:

### **Assistance in securing better pay, careers and education**

3. \_\_\_Help to find better a paying job, develop careers, get further education

Describe:

### **Work related peer group support**

4. \_\_\_Work related peer support groups

Describe:

### **Adult Mentoring**

5. \_\_\_Adult Mentoring

Describe:

### **Tracking progress of youth in employment after training**

6. \_\_\_Tracking employment progress of youth after training

Describe:

All youth must receive some form of follow up service for a minimum of 12 months.

1. Does the Local Area have a process in place to allow services beyond 12 months? Comment.

2. Describe the process for used to determine the follow up services that will be provided and how the needs of the individual are used in the determination process.
3. What is the scope of service provided for Youth who participate only in the summer program?

## **E. Youth Program, Part 4, (vii) Work Experience Plan and Worksheet**

**WIA 129**

**20 CFR 664.460, 664.470**

**State Plan**

**State Policy**

**Background:** Youth Work Experiences are planned, structured learning experience in a workplace for a limited time. The workplace may be a private for profit employer, non-profit employers or public employers. The time spent at the workplace may be paid or unpaid. The main purpose of the work experience is to provide a youth with opportunities for career experience and skills development. (Although the employer may benefit the employer from the youth's labor this is not the purpose of the Work Experience)

**Purpose:** To ensure Youth Work Experiences meet the requirements of Law, Regulation and Policy.

**Documentation:** The following documents may be examined as a part of the review.

1. The Youth's assessment and employment plan or individual service strategy or employment plan.
2. Management Information System Records
3. Records of work experience duties and skills to be learned, work times and attendance, and other records relating to the work experience.
4. Records including justification if a youth is receiving on-the- job-training and is less than 18 years of age.
5. Financial records for youth that are receiving wages funded with youth funds.

**Interviews:** Interviews may be required as a part of the review.

**Questions:** These questions will be addressed in the review?

1. Is there a written description of the work experience?
2. Does the description include information on wages, duties, attendance requirements, skills, attributes or knowledge the work experience is intended to provide?
3. Were the results of the objective assessments, interests, goals and the Individual Service Strategy of the youth considered in the decision to choose a certain work experience?
4. How does the youth participate in decision making concerning work experience?
5. How are the expenditures of funds for work experience wages tracked and documented?
6. How are records maintained and retained for the required time?



**E. Youth Program, Part 4, (vii) Work Experience Plan and Worksheet**

1. Describe the process the Local Area uses to provide and objective assessment.
  
  
  
  
  
  
  
  
  
  
2. Describe the process of developing an Individual Service Strategy? include information on the participation of the youth in developing the Individual Service Strategy?
  
  
  
  
  
  
  
  
  
  
3. Does the Local Area have any youth (under 18) participating in on the job training? If so, has the Local Area provided a justification?
  
  
  
  
  
  
  
  
  
  
4. Chose a suitable sample individuals participating in Work Experience.

<b>Name</b>	<b>Eligible (Younger Older Concurrent)</b>	<b>Objective Assessment</b>	<b>Individual Service Strategy</b>	<b>Work Experience</b>

**E. Youth Program, Part 5, Concurrent Enrollment**  
**WIA Sec. 126**  
**20 CFR 664**  
**State Plan**  
**State Policy**

**Purpose:** To review congruent enrollment systems to ensure compliance with law, regulation and policy.

**Documents:** The following documents will be examined as a part of the review.

1. Local Area plans and policies
2. Participant records
3. Participant and fiscal records

**Questions:** The following question will be addressed.

1. Does the Local Area ensure that concurrently enrolled participants are eligible for both programs?
2. Is the mix of services recorded in the participant's employment plan?
3. Does the Local Area ensure that program operators expend and track funds to ensure there is no duplication of expenditures?
4. Are records maintained for the required time?

**E. Youth Program, Part 5, Concurrent Enrollment  
Concurrent Enrollment Worksheet**

Select a suitable sample of congruent participants. Record

<b>Name</b>	<b>Concurrent and Eligible in both Programs</b>	<b>Employment Plan</b>	<b>Fiscal Tracking</b>

**E. Youth Program, Part 6, Summer Employment Opportunities**  
**WIA Chapters Four and Five**  
**20 CFR 664**  
**State Plan**  
**State Policy**

**Purpose:** To review the Local youth Program to ensure summer youth opportunities

**Documents:** These documents will be reviewed.

1. Local Area Plans
2. Participant Records
3. Management Information Records
4. Provider Contracts
5. Fiscal Records
6. Follow up services Records

**Question:** These questions will be addressed.

1. Does the Local Area offer an integrated Summer Employment Opportunities experience?
2. Does the Local Area offer all participants in the Summer Employment Opportunities experience 12 months of follow up services?
3. Were services provider contracts awarded through the competitive procurement processes? (excluding the grant recipient / fiscal agent and employers providing unsubsidized employment)
4. Have youth participants in the Summer Employment Opportunities been properly included in the core measurement used to determine performance?

**E. Youth Program, Part 7, One-Stops to Service to Youth  
Plan and Worksheet  
WIA Sec. 121, 129  
20 WIA 664.700, 664.710  
State Plan  
State Policy**

**Purpose:** To determine services provided and ensure a system to identify the systems and controls used to ensure the proper expenditure of WIA funds.

**Interviews:** Interviews may be required as a part of this review.

**Questions:** These questions will be addressed as a part of the review.

1. Is the Chief Elected Official (or designee) a One Stop Partner?
2. Does the youth program and the One Stop system include additional connection to facilitate:
  - 1) Coordination and provision of youth activities?
  - 2) Linkages to the job market and employers?
  - 3) Access for eligible youth to the information and service required in Sec 664.400 and 664.410?
  - 4) Other activities described in WIA Sec. 129 (a) and 121 (b) (1) (B) (i)
3. Does the local area have systems and controls in place to ensure that Youth Funds are expended only on eligible youth. The Local Area may offer non-eligible youth those services authorized by other programs.
4. Are records retained and maintained for the required period?

**E. Youth Program, Part 7, One stops to Service to Youth Plan and Worksheet**

1. Who is the Chief Elected Official? \_\_\_\_\_  
Who represents the CEO as the One Stop Partner? \_\_\_\_\_  
*Explain:*

2. Does the One-Stop offer additional allowed service such as the following?  
1) Coordination and provision of youth activities?  
*Explain:*

2) Linkage to the Job market and employers?  
*Explain:*

3) Access for eligible youth to information and service required in 664.400

Access for eligible youth to information and service required in 664.410

4) Other activities (WIA Sec. 129)

3. Describe the system to track participation and financial expenditures on eligible participants?  
*Describe?*

**F. Individual Training Accounts (ITA) Monitor Plan**  
**WIA 122, 134**  
**20 CFR 663.320, 663.410-440, 663.508**  
**State WIA Policy**

**Purpose:** NDOL, Office of General Counsel Program Monitor will conduct a desk review of Individual Training Accounts (Its) policies and procedures. This oversight is to provide a picture of ITA issuance, usage and customer use as it is implemented in the local area in comparison to the Act, Regulations and Policy of Workforce Investment Act Title I program operations. Documentation and other information may be recorded, gathered or copied as a part of onsite program or activity reviews and retained for this oversight activity.

**Documents:** These documents will be reviewed as part of this review:

1. MIS Occupational Skills Training Printout
2. Eligible Training Provider Lists
3. Participant Record
4. ITA Printouts
5. Individual Employment Plan (IEP)
6. Local Workforce Investment Board Records
7. Local Workforce Investment Board Policies
8. Local Workforce Investment Act Plans

**Questions:** These questions will be addressed by this review:

1. Does the local board have a policy in place that defines skills in demand occupations?
2. Does the local area provide assessment, counseling, and development of an IEP through intensive services prior to selecting a training program?
3. Does the local area have a policy in place for exceptions to the list of locally recognized demand occupations?
4. Does the local area have systems in place to communicate in simple, understandable language the ITA training services policy to customers, including delivery method?
5. Does the local area have a policy in place regarding the duration and/or dollar amount of ITAs?
6. Does the local area have a policy in place which identifies the content of the ITA (books, fees, or other instructional materials)?
7. Does the local area have policies or procedures in place, which document that other assistance is unavailable or insufficient?
8. Does the local area have a formal process for tracking WIA Title I expenditures paying for ITAs?
9. Does the local area have a method for disbursement of funds limiting training

providers that are on the list of eligible training providers as the only parties able to redeem ITAs for payment?

10. Has the local board identified any exceptions to the ITA requirement in addition to on-the-job training or customized training components?



## F. Individual Training Account Checklist

Policy and Procedure Checklist

worksheet

SEE OCCUPATIONAL SKILLS TRAINING WORKSHEET FOR ITA RELEVANT QUESTIONS/EXAMINATION FROM PARTICIPANT RECORDS

ITA Policy Worksheet

Question: Does Local Area Policy -	Policy
1. Identify how participants will receive assessment, counseling, and an individual employment plan through intensive services prior to selecting a training program?	
2. Do participant records examined during Eligibility or Training Activity Reviews support this?	
3. How the ITA training services policy will be communicated in simple, understandable language to customers of the one-stop center, including delivery methods.	
4. Describe how the participant will have access to the list of eligible providers through the One-Stop system?	
5. Do participant records examined during the Eligibility or Training Activity Review support follow through on this?	
6. A set duration of ITAs and is it included in the plan?	
7. Does the ITA contain language requiring educational institutions financial aid officer to inform the local staff of the amounts and disposition of any HEA, Title IV awards and other financial aid awarded after enrollment?	

<p><b>8. Coordination of funds with other grant sources for training such as Pell Grant?</b></p> <p>(must include other financial assistance to pay for training costs, so those WIA funds supplement other sources of training grants. The exact mix of funds should be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid and that necessary supportive services are available.)</p>	
<p><b>9. Do participant records examined as part of eligibility or training activity review support 8 and 9?</b></p>	
<p><b>10. Include formal procedures to assist participants early in the assessment process to establish eligibility for HEA Title IV funds and other financial aid?</b></p>	
<p><b>11. Include guidelines to determine and document prior to training enrollment that coordination of available Federal, State, and local resources has occurred to sufficiently meet the training and education related costs of services. (Resources may include wages earned by participant.)</b></p>	
<p><b>12. How the local staff will record the participant training related financial assistance needs and the mix of funding assistance (employment and training and HEA) in participant record?</b></p>	
<p><b>13. Procedures and forms to authorize release of participant's financial aid information by the post-secondary institution?</b></p>	
<p><b>14. Define a formal process for tracking WIA Title I expenditures paying for the individuals training?</b></p>	

<b>Has documentation been supplied?</b>	
<b>15. The method of disbursement of funds. Only training providers that are on the list of eligible providers are able to redeem ITAs for payment?</b>	
<b>16. Identify approved exceptions (other than OJT or Customized training)</b>  <b>If yes, do they meet requirements?</b>	
<b>17. Training services, whether accessed by ITAs or under contract are provided in a manner that maximizes consumer choice?</b>	
<b>18. How Eligible Training Provider List is made available?</b>	
<b>19. Have appropriate contractual safeguards in the contract with post-secondary institution to prevent the participant from being billed for outstanding charges?</b>	
<b>20. Include operating procedures concerning the cost of training and training-related expenses that reflect prudent fiscal management and result in outstanding customer satisfaction? (encouraged not required)</b>	

**G. On the Job Training (OJT)/Customized Training Monitor Plan**  
**WIA 101, 134, 181, 188, 195**  
**20 CFR 663.700-720,**  
**667.200-274, 29CFR98, 29CFR93, 29CFR31**  
**State WIA Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct a desk review of policies and procedures for OJT and customized training for adults and dislocated workers. Compliance to the Workforce Investment Act (WIA), regulations and State policies will be examined for training activities, employer orientation, agreements, record keeping and evaluation.

Documentation, information and participant records will be requested, examined and copied as part of other onsite reviews and retained for completion of this desk review. Records of the following areas will be examined:

- Availability of information
- Provider eligibility process
- Agreements/Contracts
- Oversight process

**Documents:** These documents will be examined as a part of the review of OJT and customized training

- Employer Selection/Evaluation prior to contract
- Employer Orientation
- OJT Contract/Agreement
- Basis for activity selection
- Customized Training Contract/Agreement
- Oversight record
- Participant record
- MIS activity report

**Interviews:** Questions relating to this area may be included in other onsite interviews or staff may be contacted by phone for clarification.

**Questions:** The following questions will be addressed as part of this review:

1. Does the local area limit training services to Adults & Dislocated Workers who have received an intensive service, been determined in need of training services, and documentation retained in participant record?
2. Does the local area have a process in place to determine appropriateness of training, participants and providers?

3. Does the local area have an appropriate process in place for approval of customized training?
4. Does the local area require that employers pay not less than 50 percent of the cost of customized training?
5. Does the local area have an appropriate agreement in place for OJT and customized training?
6. Does the local area have an appropriate oversight process?
7. Does the local area maintain and retain documents and records and make them available as required?
8. Do OJT contracts contain the required assurances?

## G. Customized Training Worksheet

participants meeting eligibility requirements for Intensive Training?

I. <b>Participant Eligibility:</b> <i>Did reviewed training activities include I. Requirements</i>	Yes	No	Documented
1. Has participant been determined in need of training?			
2. Has it been determined that employee is not earning a self-sufficient wage as determined by the local Workforce Investment Board?			
3. Does IEP show selection/need/plan?			

II. <i>Activity Evaluation</i>			
1. Is it determined that employee(s) to be trained are not earning a self-sufficient wage (as determined by local board) prior to training?			
2. Has employer made a commitment to employ/continue to employee participant upon successful completion of training?			
3. Has employer agreed to pay 50% of training costs?			
4. Is training designed to meet a special requirement of employer or group of employer?			
5. Does training relate to introduction to new technology <b>OR</b>			
6. introduction to new production or service <b>OR</b>			
7. upgrades new jobs that require additional skills <b>OR</b>			
8. workplace literacy <b>OR</b>			
9. purposes identified by the Local Workforce Investment Board			
10. Does the local are ensure that business has been at the current location for a minimum of 120 days, if relocation resulted in job loss at the original site, prior to authorizing customized training?			
11. Does the local area have policies in place to determine suitability of training?			

# Worksheet

## G. OJT Monitor Review Worksheet *example*

**Entity Reviewed:** \_\_\_\_\_

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

**Date:** \_\_\_\_\_

<i>I. Participant Eligibility</i>	<b>Yes</b>	<b>No</b>	<b>Documented</b>
<i>Did reviewed training activities include participants meeting eligibility requirements for Intensive Training?</i>			
4. Has participant been determined in need of training?			
5. Has it been determined that employee is not earning a self-sufficient wage as determined by the local Workforce Investment Board?			
6. Does IEP show selection/need/plan?			

<i>II. Pre Award Review or Employer Evaluation</i> Service deliverers shall determine if the employer/training provider is qualified and capable of entering into an agreement to provide on-the-job training. The following need to be asked for information that needs to be identified: ➤ <b><u>Multiple or follow-on contracts with the same employer need not have a PAR review of subsequent contracts if a review has been conducted within the past (6) months.</u></b>			
1. Does the local area use a preaward review (PAR) criterion established by the state for both OJT and Customized Training?			
2. Does the PAR establish if the employer is new or an established business?			
3. Does the PAAR ask if the applicant has worked for the employer at any time in the past, and if so, what were the dates and circumstances?			
4. Does the PAR include an evaluation of employer hiring practices in general and for this position in particular?			

5. Does the PAR ask what the employee turnover has been for this employer and this particular position ( <b><i>contracting with employers who have high employee turnover rates should be avoided</i></b> )?			
6. Does the PAR ask if the employer incurred any layoffs in the last twelve months?			
7. Does the PAR determine if the position is full or part-time, and is it permanent, temporary or seasonal?			
8. Does the PAR determine if the position is covered by a collective bargaining agreement, and if so, is the training consistent with such agreement?			
9. Does the PAR establish if there have been any OSHA, wage and hour, or child labor law violations in the past year?			
10. Does the PAR include minimum job qualifications for the position, and is there a written job description?			
11. Does the PAR include an analysis of pay and benefits are they equivalent to similar positions in the local labor market and/or similar positions with the employer?			
12. Does the PAR verify that the employer provides worker's compensation or accident insurance?			
13. Does the PAR include a determination that the employer's accounting system (especially payroll), personnel system, grievance system, etc., adequate to administer the contract agreement?			
14. Does the PAR include a determination that the employer is not presently disbarred or suspended from receiving federal contracts?			
15. Does the PAR include: What share of the employers' workforce is enrolled in on-the-job training contracts? ( <i>*traditionally should not exceed one out of four</i> )			
16. Does PAR include names under which the establishment does business, including predecessors and successors in interests?			
17. Does PAR include name, title, and address of the company official certifying the information?			



18. Does the PAR address requirement that OJT contracts shall not be entered into with employers who have received payments under previous contracts and have exhibited a pattern of failing to provide on the job training participants with long term employment as regular employees?			
19. Does the PAR address the requirement that no individual may be placed in training: ➤ Positions that do not or cannot have a supervisor present ➤ Temporary positions that are supplied to employers by temporary employment contracts ➤ If a member of that person's immediate family is directly supervised by or supervises that individual?			
20. Does the PAR include an evaluation before recontracting? ➤ <i>Recontracting is allowable and certainly desirable when an employer/training provider has a high success rate of training and placement.</i> ➤ <i>Should not be entered into with employers who have exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wage rates and benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same work.</i>			
<b>III. OJT Contract Requirements</b> <b>OJT contracts shall have been procured in accordance with Federal, State and Local procurement policies and at a minimum shall contain or address the following information:</b>			
1. The Occupation(s) for which training is to be provided: ➤ <i>Training will be provided only for those occupations for which there is a demand in the local area involved, or in another area to which the participant is willing to relocate.</i>			

<p>2. The duration of the contract must be limited to the period of time required for a participant to become proficient in the occupation for which training is being provided:</p> <ul style="list-style-type: none"> <li>➤ <i>Consider skill requirements of job</i> <ul style="list-style-type: none"> <li>➤ <i>Academic and occupational skill level of participant</i></li> <li>➤ <i>Prior work experience</i></li> <li>➤ <i>The participant's IEP</i></li> </ul> </li> </ul> <p><b>(Refer to local area plan - policies must be included)</b></p>			
<p>3. The wage rate to be paid to the trainee.</p> <ul style="list-style-type: none"> <li>➤ <i>Must be compensated at the same rates including periodic increases, as trainees or employees who are situated in similar occupations by the employer and who have similar training, experience, and skills.</i></li> <li>➤ <i>Rates must be in accordance with applicable law, but may not be less than the higher of the rate specified in Section 6(a)(1) of the Fair Labor Standards Act of 1938 or the State or Local Minimum Wage</i></li> </ul>			
<p>4. The rate of reimbursement to the employer:</p> <ul style="list-style-type: none"> <li>➤ <i>Reimbursement must not exceed 50% of the wage rate of a participant</i></li> <li>➤ <i>Compensation for extraordinary costs associated with training participants</i></li> <li>➤ <i>Costs associated with lower productivity of participants</i></li> <li>➤ <i>Documentation of extraordinary costs not required</i></li> </ul>			
<p>5. States the maximum amount of reimbursement?</p>			
<p>6. A training outline that reflects skills and competencies to be learned in position.</p> <ul style="list-style-type: none"> <li>➤ <i>Efforts should be made to develop programs that contribute to occupational development, upward mobility, new careers, and opportunity for nontraditional employment.</i></li> <li>➤ <i>Employer should keep documentation of evaluations and progress of the trainee in learning the skills and competencies.</i></li> </ul>			

7. An outline of any other separate classroom training that may be provided by the employer.			
8. The employer's agreement to maintain and make available accurate: <ul style="list-style-type: none"> <li>➤ Time and attendance</li> <li>➤ Payroll</li> <li>➤ Other records to support reimbursement claims</li> </ul> <p><i>Required State/Federal/FICA taxes must be withheld and records available.</i></p>			
9. OJT contracts for <b>employed workers</b> must relate to the introduction of new technologies, production or service procedures, upgrading to new jobs that require additional skills, workplace literacy or other appropriate purposes identified by the local board. <ul style="list-style-type: none"> <li>➤ <i>May be written when the employee is not earning a self-sufficient wage as determined by local policy.</i></li> </ul>			
<b>OJT CONTRACTS MUST INCLUDE THE STANDARD ASSURANCES IN SECTION IV.</b>			

<b>IV. ASSURANCES</b> <i>OJT Contracts must include several standard assurances that are designed to acknowledge a contractor's responsibilities in accepting public funds for training. At a <b>minimum do contract assurances</b> include these issues:</i>			
1. At the end of the training period, the employer intends to retain the trainee in the occupation and compensate the trainee for <b>at least the hourly wage rate specified in the in the contract</b> agreement. Retention is subject o employer's right to terminate the participant for normal business or personnel reasons.			
2. Individuals in OJT training must be <b>provided wages, benefits and working conditions at the same level</b> and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.			

3. Funds provided to employers for OJT must not be used to directly or indirectly assist, promote or deter <b>union organizing</b> .			
4. No individual in a decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a contract supported by WIA funds if a <b>conflict of interest</b> would be involved. Including WIB Members			
5. No members of <b>the participant's immediate family</b> shall serve in an administrative capacity for the employer, or will directly supervise the trainee. Immediate family is defined as: <i>trainees spouse, Children, Parents, Grandparents, Grandchildren, Brother, Sister or Person bearing the same relationship to trainee's spouse</i>			
6. The employer will provide <b>worker's compensation</b> coverage for trainee and abide by health and safety standards established under State and Federal law.			
7. Participants shall not be employed to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for <b>sectarian instruction or</b> as a place for <b>religious worship</b> . <i>Except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants.</i>			
8. No <b>political activities</b> will be conducted by a participant in training under the provisions of an OJT contract funded under the Workforce Investment Act.			

9. The employer <b>will not discriminate</b> against any trainee on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any workforce Investment Act Title I-financially assisted program or activity. <i>There should be no violations of this provision during the two years prior to OJT contracting.</i>			
10. The employer certifies that neither it nor its principals are presently <b>disbarred, suspended, proposed for debarment, declared ineligible or voluntarily</b> excluded from participation in this contract by any Federal department or agency.			
11. The employer certifies that it will provide a <b>drug-free workplace</b> as defined by the Drug-Free Workplace Act of 1988.			
12. The employer is in <b>compliance</b> with all State and Local laws regarding <b>taxation and licensing</b> ?			
13. The employer agrees to participate in and be bound by <b>determinations resulting from the Local Area grievance procedure.</b>			
14. Trainees who are working as <b>laborers/mechanics</b> in any construction, alteration or repair (including painting and decorating) or public buildings or works must be compensated in compliance with the <b>Davis-Bacon Act</b> , as amended.			
15. A trainee in an OJT program shall <b>not displace</b> (including partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee (as of the date of participation).			

16. The employers agrees that no trainee shall be hired into or remain working in any position when <b>any other individual is on layoff from the same</b> or any substantially equivalent job. An OJT trainee may not be employed in a job if the employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy with the WIA Participant. It is not allowable for an OJT job to be created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.			
17. The contract will not encourage or induce the <b>relocation of a business</b> (or part thereof) from any location in the United States, if the relocation results in any employee losing his or her job at the original location.			
18. Nothing in the OJT contract shall impair <b>existing contracts</b> for services or <b>existing collective bargaining agreements</b> unless the employer and the labor organization <b>concur in writing</b> .			
19. Either party may <b>terminate the contract</b> at any time for convenience by giving written, signed notice of intent to terminate to the other party.			
<b>20. Modifications</b> of the contract shall not be effective until put in writing and signed by both parties. Revisions to the contract which do not impact the total funds obligated or training program may be effected by a letter of agreement.			
21. If the employer <b>violates any of the conditions in the contract</b> or any applicable Federal, State or local law, and such violations <b>results in liability for the grantor agency</b> , the employer shall promptly reimburse the grantor agency an amount equal to the resulting liability.			
V. <b>Performance Information</b> <i>One-Stop operators in a local area must collect performance information on providers of on-the-job training. At a minimum, does the performance information include:</i>			
1. <b>6-month retention</b> rate. ➤ 70% is recommended			
2. <b>Rate of successful</b> completion of OJT Training			

3. Average wage of OJT training Recipient and <b>wage after his/her training ends</b> ➤ Increase ➤ decrease			
4. <b>Trainee dismissal</b> after training or during follow up review			
5. Recent <b>layoffs</b>			
6. Trainee <b>grievances</b>			
7. <b>Displacement</b> of current employees by WIA trainees			
8. <b>Relocations</b> to utilize WIA trainees			
The One Stop operator will determine whether providers meet acceptable performance levels for the above criteria. If a provider meets the performance criteria, it is considered an eligible provider of training services. Employers/training providers who are denied eligibility by a one-stop operator to provide OJT have appeal rights as described in the "Eligible Training Provider" policy.			
1. <i>Can the One-Stop operator produce an approved provider list for OJT, which includes performance information?</i>			
2. How is this information <b>disseminated</b> through the One-Stop delivery system?			
<i>*OJT providers are not subject to the requirements of training services in Sec. 122, except for the requirements relating to enforcement and appeal.</i>			

VI. Monitoring and Oversight by Local Area <i>Service deliverers must monitor training, invoice and reimbursement systems on a pre-determined systematic and documented basis. Employers shall be required to maintain an internal supporting documentation system in accordance with contract record requirements and service deliverers shall include contract provisions that will allow access to those records by authorized entities.</i>			
1. Does the local area have a <b>system to monitor</b> OJT contracts?			
2. Are onsite monitoring reviews conducted <b>at least once</b> during the course of the contract?			
3. Are contracts, which have been established with employers for multiple positions, reviewed for <b>each position</b> ?			

4. Does the review system include a review of <b>selection patterns</b> and other areas of potential concern regarding <b>trainees' civil and other employment rights</b> to ensure the quality of the One-Stop operator's selection of training opportunities?			
5. Are monitoring reviews documented by a formal written report?			



## **H. Supportive Services for Adult/Dislocated Worker Programs Monitor Plan**

**WIA 101, 134**  
**20 CFR 663**  
**State WIA Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct oversight of procedures and practices for supportive service and needs related payments as they comply with the Workforce Investment Act (WIA), regulations and State Policy. Documentation and information may be gathered and retained as a part of other onsite reviews and used for completion of the Supportive Service desk review.

**Documents:** These documents will be examined as part of this review:

- Written policies, if available
- LWIB Records
- Supportive Service Authorization/Request/Documentation
- Participant File
- Policy for information sharing on local resources

**Interviews:** Questions relating to this area of review may be raised during onsite interviews for eligibility or staff may be contacted by phone for clarification of gathered information.

**Questions:** These questions will be addressed by this review:

1. Does the local area have systems in place to limit supportive services to individuals participating in core, intensive or training services?
2. Does the local area have procedures in place to show that supportive services are not available through other programs providing such services?
3. Does the local area have systems in place to document that supportive services are necessary to enable individuals to participate in activities?
4. Has the local Workforce Investment Board limited supportive service amounts and types of allowable services or granted authority to the One-Stop operator to establish such limits?
5. Have procedures for exceptions been established by either of the above?
6. Does the Local Area provide Needs Related Payments (NRP) in an appropriate manner?

Supportive Service Worksheet Adult/Dislocated Worker

Allowable		Participant Name	Vendor	Reason	Service Provided	Documentation	Authorized By
Yes	No						
		1.		example			
		2.					
		3.					
		4.					
		5.					
		6.					
		7.					
		8.					
		9.					
		10.					
		11.					
		12.					
		13.					
		14.					
		15.					
		16.					
		17.					
		18.					
		19.					
		20.					
		21.					
		22.					
		23.					
		24.					
		25.					
		26.					
		27.					
		28.					
		29.					

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

**I. Follow-up Monitor Plan**  
**WIA134, 129**  
**20CFR662, 663, Preamble**  
**State WIA Policy**

**Purpose:** NDOL, Office of General Counsel Program Monitors will conduct a review of local area Follow -Up process and practices for Adult, Dislocated Worker and Youth WIA Title I Financially assisted programs. Practices as well as policies will be compared to the Act, Regulations and State Policies for Workforce Investment Act programs. Participant Records may be reviewed in combination with other onsite reviews and documentation retained for this review.

**Documents:** These documents will be examined as part of the review:

MIS Activity Reports  
Participant Records  
Local Area Follow-up Policy

**Interviews:** Interviews will be conducted as necessary to explore policies and practices with the following:

Local Workforce Investment Area Director  
Local Workforce Investment Area Staff

**Questions:** The following questions will be addressed in this review:

1. Does the local area have an appropriate policy in place to provide follow-up services for to Adult and Dislocated Workers?
2. Does the local are have an appropriate policy in place to provide follow-up services to Youth?
3. Does the local area provide appropriate services as follow-up activities?  
Is the process for determining follow-up service activities and duration documented in participant files?
4. Does the local area record follow-up contact in first, second and third quarter after exit into the Tracking and Retrieval Exchange (TREN) database?

**I. Follow-Up Worksheet**  
**Review of Follow Up Documents**

1. From MIS printouts number of participants exiting with unsubsidized employment during the selected timeframe \_\_\_\_\_ to \_\_\_\_\_:

Adult \_\_\_\_\_

Dislocated Worker \_\_\_\_\_

Youth \_\_\_\_\_

2. From MIS printouts how many of the group above have been contacted for follow-up:

	First Quarter	Third Quarter	Fifth Quarter
Adult	_____	_____	_____
Dislocated Worker	_____	_____	_____
Youth	_____	_____	_____

3. What type of follow-up services have been provided to:

Adult:

Youth:

Dislocated Worker:

4. Select all or sample (dependent on size of population) for each group and complete Participant Worksheet.

I. Participant Follow Up Checklist

Participant	Date of Unsubsidized Employment	Program • Adult • DLW • Youth	Determination of Intensity of Follow Up Services	Period of Follow Up Services	Contacted Record (MIS)			Information on One Stop Assistance	Additional Career Planning/Counseling	Assistance w/work related problems	Peer Support Group	Info on Educational Opportunities	Referral Community S.S.
					1 <sup>st</sup> Qtr	2ndQtr	3 <sup>rd</sup> Qtr						
1.													
2.													
3.													
4.													
5.													
6.													
7.													
8.													

**J. EO/Nondiscrimination Monitor Plan**  
**WIA 1998**  
**ARRA 2009**  
**20CFR667, 29 CFR 37**  
**NDOL Equal Opportunity/Nondiscrimination Manual**  
**State WIA Policy**  
**State Plan**

**Purpose:** To review compliance of procedures for EO/Nondiscrimination to the law and regulations. To establish that local area delivery of programs is being conducted in a nondiscriminatory manner.

**Documents:** Information and materials collected and encountered during annual program reviews will be considered in the evaluation of compliance. Documents examined for this review may include, although not necessarily limited to, the following:

- Local Area Equal Opportunity Officer (EOO) information
- Organizational Chart (identifying EOO)
- Publication of EOO (to include contact information)
- Discriminatory Complaint Logs
- Complaint Process
- Staff Demographics
- Personnel Activities
- Local Plan
- Training Plans
- EOO Reviews
- Limited English Proficiency Service Plan
- MIS Reports
- Participant Files
- Recruitment Materials (brochures, advertisements)
- Policies and Issuance

**Interviews:** Interviews or questionnaires may be addressed to these parties:

- Local Area EO Officer
- Department of Labor, Human Resources
- Local Area Administrator

**Questions:** The following questions will be addressed in this review:

1. Has the Workforce Investment Board named an Equal Opportunity Officer meeting the criteria implementing regulations able to fulfill EOO responsibilities?
2. Does the local area provide initial and continuing notice of the EOO, contact information and program declarations that it does not/cannot discriminate on prohibited grounds?
3. Do Contracts, RFPs, plans, OJT (contracts and/or PreAwards) and other financial assistance agreements contain prescribed assurances?
4. Does the local area take appropriate steps to ensure that they are providing programmatic and architectural universal access to their programs and activities by making reasonable efforts to include members of both sexes, various racial and ethnic groups, individuals with disabilities and individuals in differing age groups?
5. Does the local area take appropriate steps to ensure that communication with individuals with disabilities are as effective as communication with others including a process to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of programs and

C:\Documents and Settings\dave.pedersen\Desktop\WIA Monitor Manual.docPage 134 of 211

activities which includes processes for reviewing and furnishing auxiliary aides or services when necessary?

6. Does the local area have a Limited English Proficiency Plan to provide service in areas where a significant number or proportion of the population may need languages other than English in order to be effectively informed about, or able to participate in programs or activities?
7. Does the local area collect equal opportunity data maintaining in program information systems able to report out on applicants and participants including demographic information sufficient to determine whether they have complied or are complying with nondiscrimination and equal opportunity provisions?
8. Has the local area developed and published, on behalf of its service providers, a complaint processing procedure to include: initial written notice of receipt, written statement of issues, period of fact-finding or investigation, alternative dispute resolution (ADR), written notification of final action?
9. Is there a system in place to promptly notify the U.S. DOL Civil Rights Center Director when administrative enforcement actions or lawsuits are filed against it alleging discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief and/or beneficiaries only, citizenship or participation?

## J.

### Interview with Local Area Manager/One-Stop Operator:

NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

- 1) What policies, procedures and practices are in place which address the inclusion of those with disabilities in activities?
- 2) What policies, procedures and practices are in place to prohibit denial of an individual with disabilities the opportunity to participate as a member of a planning or advisory board?
- 3) What are the policy procedures providing reasonable accommodation and reasonable modifications for individuals with disabilities:
  - For applicants
  - Participants
  - Employees
- 4.) Have there been any circumstances where accommodations have not been made because they would cause under hardship?
  - If yes, Describe
  - Documentation (Was notification sent to affected parties?)
- 5.) Are auxiliary aides or services offered/provided where necessary to afford individuals with disabilities and equal opportunity to participate in program?
- 6.) What telecommunications devices are available for individuals with hearing impairment to communicate with your organization?
- 7.) What accommodations are available to serve the visually impaired?
- 8.) How is the Equal Opportunity and Complaint Policy disseminated to the public, participants and employees?
  - Initial
  - Ongoing
- 9.) Has an EO Officer been selected?



Is complete information provided on the EO Officer?

- ☐ Name
- ☐ Job Title
- ☐ Location
- ☐ Email Address
- ☐ Phone
- ☐ TDD

10.) How is EO Officer information disseminated to:

- Customers
- Employees
- Interested Public

11.) What policies, practices or procedures are in place to assure that reasonable accommodation and reasonable modifications are provided for persons with disability?

- Public
- Employees

12.) What steps have been taken to ensure communication with individuals with disabilities are as effective as communication with others?

13.) What auxiliary aids or services are available:

- TDD
- Large Print
- Braille
- Readers
- Other

14.) What has the local area done to serve populations with language barriers:

- Recruitment
- Serve
- Communicate

15.) What languages other than English is information available in?

- 16.) How was the need determined? (Include community organizations that were involved)
- 17.) Does each presentation or orientation for new participants, new employees, and/or the general public to your WIA Title I financially assisted program or activity include a discussion of rights under the nondiscrimination and equal opportunity provision of WIA, including the right to file a complaint of discrimination?
- 18.) Are there any EO/AA/Nondiscrimination complaints currently pending?
- 19.) Do you have a copy of the State of Nebraska, Methods of Administration?
- 20.) Has an EO/Affirmative Action review been completed by your EOO?
- 21.) Did you receive a written report?
- 22.) Has an accessibility review been completed? (When, Whom)

**Interview EO Officer:**

1. Are procedures and recordkeeping in place to meet requirements?
2. Are reports completed and submitted per requirements?
3. Whom does the EO report to?
4. Are there support staff available to assist in EO duties?
5. List training attended in past 12 months:
  - EOO
  - Staff
6. List training available to LWIA staff:
  - Provided by EOO
  - Outside training
7. Do you area have a copy of the State of Nebraska, Methods of Administration?
8. Has an EO or Affirmative Action review been completed?
9. Are reports being completed and submitted as required?

## **K. Grievance Procedures Review Plan**

**WIA Sections 188**

**20 CFR 667..270.667.600-630**

**State Plan**

**State Policy**

### **Background:**

The entity is required to establish a procedure for grievance and complaints. The local area's procedure should include:

- a process that makes reasonable effort to assure that the information concerning grievance and complaint procedures will be understood by participant and other individuals, including youth and those who are limited-English speaking individuals (as required by 29 CFR 37.35)?
- a process for dealing with grievances and complaints from participants and others affected by Workforce Investment including One Stop Partners and providers?
- an opportunity for an informal resolution and hearing within 60 days of filing?
- a process to allow individual alleging labor standards violations to submit the grievance to binding arbitration procedures if a collective bargaining agreement has provisions that would apply to parties involved in the dispute?
- an opportunity for the local level to appeal to a State entity when
  - no decision is reached within 60 days?
  - or
  - either party is dissatisfied with the local hearing decision?

**Purpose:** Review Grievance Procedures by interviewing staff and examining records to answer these questions.

**Documents:** These documents will be examined as a part of the review:

1. Written grievance procedures.
2. Method of dissemination of procedures.
3. Records of complaints, grievances and resolution or advancement to State level.

**Interviews:** This review may require formal interviews.

**Questions:** These questions will be addressed.

1. Does the Local Area have a Grievance Process?
2. Is the Grievance Process made available to all interested parties?
3. Does the Grievance Process allow for appeal to the State entity as required?
4. Is the Grievance Process adequate to meet the WIA requirement?
5. Are records of the complaints, grievances, appeals and resolutions maintained?

Monday, February 23, 2009

## **K. Grievance Worksheet**

### **WIA Sec. 181**

#### **Grievance Procedures, Complaints, and State Appeals Process**

**Sec. 667.600 what local area, State and direct recipient grievance procedures must be established?**

#### **State Policy**

#### **Local Area Level Grievance Procedure**

Questions:

- |    |   |     |    |
|----|---|-----|----|
| 1. | Has the local area established a procedure for grievance and complaints?  | Yes | No |
| 2. | Does the local area procedure provide:  |     |    |
|    | (1) A process for dealing with grievances and complaints from participants and other interested parties?  | Yes | No |
|    | (2) Does the process include one-stop partners?   | Yes | No |
|    | (3) Does it include service providers?  | Yes | No |
|    | (4) Does it include other interested participants affected by the Local Workforce Investment System?  | Yes | No |
|    | (5) Does it make reasonable effort to assure information concerning the grievance and complaint system is understood by affected participants and other individuals including youth and those who are limited-English speaking individuals as required by 29 CFR 37.35. | Yes | No |
|    | Comment:  |     |    |
|    | (6) Does it provide and opportunity for informal resolution?  | Yes | No |
|    | (7) Does it provide opportunity for a hearing?  | Yes | No |
|    | (8) Is there a provision that will assure that the opportunity and the hearing will be provided within sixty days?  | Yes | No |

(9) Is there a process, which allows an individual alleging a labor standard violation to submit the grievance to a binding arbitration procedure if there is a collective bargaining agreement? Yes No  
Comment:

(10) Does it provide an opportunity for a local level appeal to a State entity when no decision is rendered within sixty days? Yes No

(11) Does it provide for the appeal to a State entity when either party is dissatisfied with the local hearing decision? Yes No  
Comment:

3. How is the Local Area Grievance Procedure disseminated to interested parties?

4. Is the procedure made available to applicants, participants, contractors, other interested parties and the general public? Describe.

5. Does the Local Area have any complaints pending?  
If so are procedures being followed?

6. Does the Local Area maintain and retain records and documentation for the required time?

Note: Physical location \_\_\_\_\_  
Individual/Position in charge of records and documents. \_\_\_\_\_

**L. Financial Oversight Review Plan**  
**Workforce Investment Act of 1998**  
**Social Security Act (Amended) Sec. 403**  
**29CFR Part 667, 20CFR645, 29CFR97**  
**29CFR95, 48CFR31; 31 CFR205,**  
**OMB A-133, A-122, A-87, A-21**  
**WIA State Policy**  
**WtW Fiscal Systems and**

**Purpose:** Nebraska Department of Labor, Office of General Counsel monitor will conduct comprehensive financial oversight of Workforce Investment Act (WIA) and Welfare-to-Work (WtW) programs. The purpose of these oversight activities is to assess the fiscal accountability of WIA and WtW within the Local Workforce Investment Areas of Nebraska.

The monitoring team will conduct financial oversight through site visits, desk reviews and analyses of fiscal activities, records and reports. The review will seek to ensure that the entities under review are in compliance with applicable uniform administration requirements and the Office of Management and Budget (OMB) Circulars are being followed with respect to relevant cost principles. Fiscal reviews will be conducted to ensure that resources are efficiently and effectively used for authorized purposes and that internal controls and accounting procedures are in place to protect from waste, fraud and abuse. Financial system oversight reviews will be conducted on an annual basis with the possibility of altered frequency to reflect need and review history of the entities subject to review

**Documents:** These documents will be examined as a part of this review:

- Notice of Obligation
- Title I Plans and approval document
- Quarterly Reports
- Monthly Fiscal Reports
- MIS reports (including participant data reports)
- Request for reimbursement/drawdown records
- Organizational chart/description of fiscal systems
- Chart of funds
- Accounting procedures
- Accounting records
- Cost allocation chart
- Additional records necessary to trace expenditures
- Local Area written policies and procedures

**Interviews:** Interviews will be conducted as deemed necessary, with:

- Local Workforce Investment Area Administration
- Fiscal Officers
- Personnel of the entity identified by the Local Workforce Investment Board as responsible for the receipt and disbursement of funds.

**Questions:** The following questions will be addressed by the review:

1. Does the local area have financial management systems in place which allow for completion of accurate, current, and complete disclosure of financial results of financially assisted activities to meet federal reporting requirements?
12. Does the local area have financial management systems in place which meet the requirements for record maintenance which adequately identify the source and application of funds expended for financially assisted activities?
13. Does the local area have financial management systems in place, which provide effective control and accountability of assets?
14. Does the local area have procedures in place for comparison of actual expenditures or outlays to budgeted amounts?
15. Does the local area financial management system ensure that OMB costs principles, agency program regulations and terms of grant will be followed in determining the reasonableness and allowability of cost?
16. Does the local area maintain accounting records in support of expenditures for cancelled checks, paid bills, payrolls, time and attendance records, contract and subgrant award documents etc?
17. Does the local area maintain and retain records and documents as required?
18. Does the local area financial system maintain a minimal time-lapse between transfer of funds and disbursement of those funds?
19. Does the local area accounting system perform sufficiently to allow for tracking of compliance to the administrative costs limit of WIA?
20. Does the local area accounting system perform sufficient to all for tracking expenditures to verify that WtW expenditures of "other category" participants has not exceeded 30% of the grant?
21. Does the local area accounting system perform sufficiently to allow for tracking of in and out of school youth participants and expenditures?

## **L. Financial Oversight Monitoring Guide**

### **I. General Information**

#### **Verify**

Source of

Subrecipient:

Fiscal Year End:

worksheet

example

**Covered**

**Yes   No**

No of Contracts with LWIA:

Level of funding:

Basis of Funding

- Performance
- Cost Reimbursement

### **II. Objective**

Determine that the subrecipient fiscal control and accounting procedures are in accordance with generally accepted accounting principles (GAAP)?

Determine that the subrecipients accounting procedures are sufficient to permit the preparation of required reports, tracing of expenditures, program income and stand-in costs.

Determine that the subrecipient maintains adequate systems of internal controls to safeguard assets and financial records.

Evaluate randomly selected invoices.

### **III. Preliminary Work**

A. Notification letter and request:

- Cost Allocation Matrix for period to be reviewed
- Cash Control Registry for period to be reviewed

B. Examine during review:

- Payroll



- Petty Cash Fund
- Invoices submitted during review period
- Invoices, cancelled checks, timecards, related to Disbursements
- Organizational Chart
- Description of Fiscal Procedures
- Written Policies
- Leases (facility/equipment)
- Employees W-4
- Timesheets
- Inventory Equipment (see [Property Management Review](#))

C. Interviews (accessible for review)

- LWIA Director
- Program Director
- Accountant
- Fiscal Officer

#### IV. PRIOR TO BEGINNING ONSITE

- A. Review reference materials for updates/changes.
- B. Review previous reports. Identify corrective actions taken or areas of concern.
- C. Review fiscal reports with Program Coordinator. Identify problems or areas of concern.

#### V. ONSITE

- A. Entrance Interview
  - Outline scope and purpose of review
  - Make sure documents to be reviewed are available
- B. Address any findings from previous reviews.
  - Have they been corrected? If yes, test.
  - If no, include in report.

#### **C. Internal Controls**

- Through inquiry and observation determine, and record if the following controls exist:

#### 1. Accounting Reports

- Cash Receipts
  - Cash Disbursements
  - Payroll
  - General Journal
  - General Ledger
  - Accounts Payable Ledger
  - Petty Cash fund
- Are accounting records being safely kept?
  - Are accounting records maintained as required by contract?

#### 2. Financial Management

- Are there written accounting procedures for all activities?
  - Is the assignment of accounting duties and responsibilities expressed in the form of an organizational chart?
  - Are books maintained on an accrual basis, if not what basis?
  - Is the general ledger maintained on a timely basis?
- Last month posted:

#### 3. Cash Disbursement

- Are authorized check signers limited to those who do not have access to accounting records, cash receipts and petty cash funds?
  - Name and Positions of authorized check signers:
- 
- Are checks mailed directly after being signed without the employees responsibility for their preparation having further access to them?
  - Are checks payable to "Cash" permitted?
  - Are checks prenumbered and printed in numerical order?
  - Are checks voided if outstanding for 90 days?
  - Are voided checks mutilated and accounted for?
  - Does the supporting documentation accompany checks when submitted for approval and signing?

#### 4. Payroll

- Does each employee have a signed W-4 form and State Withholding forms?
- Do position descriptions exist for employees?
- Are additions, deletions and changes documented in the files and approved by a responsible person?
- Are hours worked by regular employees supported by signed and approved individual time cards/sheets?
- Do timesheets show allocation of time spent to programs and Cost categories?
- Do hours paid (from payroll printouts) agree with hours reported on timesheets?
- Are employees allowed to receive cash advances?
- Is salary being paid to each staff in accordance with the contract?
- Are earnings registers maintained for each staff?
- Are all timesheets/cards signed by each staff and approved by their immediate supervisor?
- Are fringe benefits specified by the contract and being paid for the staff?
- Are salary advances deducted from gross pay during the pay period immediately following?
- Review check (payroll) disbursement policy.
- 

#### 5. Testing of Records

- Payroll
  - a.) Select a sample of employees for selected periods and Review for:
    - Whether timecards/sheets are properly approved by Supervisor and signed by employee.
    - Endorsement of canceled check against signature on employee application or W-4
    - Number of hours worked agrees to payroll register
    - Hours worked are properly allocated to programs and supported by time records.
  - b.) Trace total payroll charges from the general ledger to the payroll register for the selected period(s).
  - c.) Check for payroll taxes deducted
- Non Personnel costs:
  - a.) Select a sample of payments from the cash disbursement journal and review for:

- Existence of supporting documentation
- Cancelled checks – double endorsements
- Cost are allowable

b.) OJT School Voucher and Occupational Skills Training

- Select a sample of payments made and review for:
  1. Validity of documentation supporting training Reimbursement claims
  2. Determining that training is being provided as specified in contract.

c.) Bank Reconciliation's **NOT APPLICABLE TO COST REIMBURSEMENT CONTRACTS**

**VI. Administrative Limits**

- A. Are reported (monthly fiscal reports) Administrative costs within the Standards of:
- WIA
  - WTW
- B. Are reported expenditures for WtW 30% category within 30% of the grant?

**VII. Prepare Monitoring Report**

## **Vulnerability Assessment Financial Systems and Procedures Oversight**

### **1. Internal Controls**

#### **A. Administrative**

- Entity responsible
- Route/Authorization of invoices
- Mailing of checks
- Codes – tracking
- Authorization
- Record Retention
- Petty Cash

#### **B. Accounting**

- Computer System
- Entry process
- Verification
- Reports Created

### **2. Written Procedures**

- a. Administrative (including code of conduct)
- b. Accounting
- c. Travel
- d. Procurement - - - [Addressed in Procurement Review](#)

### **3. Cost Allocation**

- a. Written Cost Allocation Plan

### **4. Property Management**

**Addressed in Property Management & Procurement Reviews**

### **5. Staffing**

- a. Organizational Chart
- b. Qualifications
- c. Job Description
- d. Selection Process
- e. Training and Development ([See Procurement Review](#))

## **6. Cash Management System**

- a. Complies with US Treasury Circular 1075
- b. Bonding

## **7. Reporting**

- Basis (i.e. accrual)

## **8. Audit**

- a. Procurement Procedures - - - [Procurement Review](#)
- b. Selection
- c. Preparation
- d. Resolution

## **9. Closeout (if in selected timeframe of review)**

- a. Due Date
- b. Final Claims
- c. Record Retention

## **10. Internal Management**

- a. Budget Analysis
- b. Financial Reports
- c. Participant Reporting

## **11. Subcontracting**

- a. Policies and Procedures
- b. Documentation
- c. Cost Analysis
- d. Selection Process - - - [Procurement Review](#)
- e. Criteria for **Performance Based Contracts**
  - 1. Record Retention
  - 2. Termination
  - 3. Access to Records
  - 4. Audit Requirements
  - 5. Scope
  - 6. Monitoring

## **12. Award Files**

C:\Documents and Settings\dave.pedersen\Desktop\WIA Monitor Manual.docPage 150 of 211

- a. Grants, Agreements, Contracts
- b. Financial Information
- c. Modifications
- d. Correspondence To/From Awarding Agency
- e. Personnel
- f. Insurance - - - **Procurement Review**
- g. Leases

### **13. Payroll Records**

- a. Signed and Authorized Timesheets
- b. W-4
- c. State Tax Withholding
- d. Payroll Authorization for Deductions

### **14. Payment Files**

- a. Second Copy of Check
- b. Code Sheet
- c. Cancelled Invoice/Check Request
- d. Signature Verifying Invoice
- e. Approval
- f. Bid Request, Proposals, and Award Letters - - - - **Procurement Review**
- g. Approval of Awarding Agency . . . **Procurement Review**
- h. Shipping slip . . . **Procurement Review**

### **15. Accounting System**

- a. Current
- b. Audit Trail
- c. Accuracy
- d. Security

## Interview Financial Systems Review

**Interviewed:** \_\_\_\_\_

**Representing:** \_\_\_\_\_

**Monitor:** \_\_\_\_\_ **worksheet** \_\_\_\_\_

**Date:** \_\_\_\_\_ **example** \_\_\_\_\_

CRITERIA	INTERNAL CONTROL  <b>**If area has a written policy/procedure include a reference and obtain copies</b>
1. Please describe your local area's cash forecasting system that assures that federal (WIA/WTW) cash on hand does not exceed the organizations immediate cash needs.	
2. How does the local area ensure adequate separation of duties with regard to the safeguarding of assets and records?	
3. Does your organization keep a Petty Cash Fund?	
4. If yes, how is it handled?	
5. Are blank checks pre-numbered and issued in order?	
6. When are checks voided?	



<b>7. Describe process following voiding of checks:</b>	
<b>8. Describe required documentation to accompany checks?</b>	
<b>9. Describe how blank checks are accounted for?</b>	
<b>10. Does your organization have any lease agreements?</b> <ul style="list-style-type: none"> <li>• Copiers</li> <li>• Postage Machine</li> <li>• Other</li> <li>• Property</li> </ul>	
<b>11. Does your organization have any service under contract?</b>	
<b>12. Where are accounting records physically kept?</b>	
<b>13. Describe internal controls to safeguard assets and assure their proper use?</b>	
<b>14. How are checks handled, printed, controls?</b>	
<b>10. Who is authorized to sign checks?</b>	
<b>11. How are checks printed?</b>	
<b>12. When was the organization most recently audited?</b> <b>**Copy of Report</b>	
<b>13. How are fiscal records stored?</b>  For how long?	
<b>14. Does the board do fiscal oversight or monitoring?</b>  Describe:	
<b>SUB CONTRACT MANAGEMENT</b>	
<b>1. Please describe your organization's policies and procedures related to monitoring subcontracts to assure conformance with the terms and conditions of their contracts and WIA/WtW.</b>	

<ul style="list-style-type: none"> <li>• Each contract is signed, dated and invoices are signed by authorized contractor staff.</li> <li>• Conformance of invoicing process with contract's line item budget and WIA/WtW requirements prior to authorizing payment of an invoice.</li> <li>• Contract payments do not exceed the total contract amount.</li> </ul> <p>** copy of the sub-contract boilerplate language for each type of contract</p>	
2. Describe the method used to compare actual expenditures with budgeted amounts for subgrant or contract?	
<b>ACCOUNTING SYSTEM</b>	
<b>1. Describe any major changes in your accounting system:</b> <ul style="list-style-type: none"> <li>• Staff Changes</li> <li>• Software Changes</li> <li>• Etc.</li> </ul>	
<b>2. Are there written accounting procedures?</b>	
<b>3. Describe accounting system in use.</b>	
<b>4. What is the most recent posting to account Records system?</b>	

<b>Debt Collection</b>	
<b>Please describe debt collect activities you have pursued this year.</b>  <b>**Copy of debt collection policy.</b>	
<b>PROGRAM INCOME</b>	
<b>1. Please describe the source and use of any program income earnings for this year.</b>	
<b>2. How does your organization track program income to assure expenditures comply with cost limitations?</b>	
<b>COST ALLOCATION</b>	
<b>1. How are cost allocations determined?</b>	

<b>2. How often are cost allocations reviewed?</b>	
<b>3. Describe any changes made to cost allocations during the last year.</b>	
**Copy of cost allocation	
<b>LIABILITY AND INSURANCE</b>	
<b>1. Describe how your organization maintains protection against:</b> <ul style="list-style-type: none"> <li>• Professional liability resulting from errors, omissions, or negligent acts of its officers, employees or agents</li> <li>• Motor Vehicle</li> <li>• Property</li> <li>• Workers Injury</li> <li>• Liability resulting from officers, directors, agents or employees authorized to receive or deposit WIA/WtW funds or to issue financial documents, checks or other instruments of program costs</li> </ul>	
<b>2. How does your organization ensure contractor/subcontractors have evidence of certificate of insurance of self-insurance for the following:</b> <ul style="list-style-type: none"> <li>• Professional liability resulting from errors, omissions, or negligent acts of its officers, employees or agents</li> <li>• Motor Vehicle insurance</li> <li>• Property insurance</li> <li>• Workers Compensation Insurance</li> <li>• Bonding Coverage for every officer, director, agent or employee authorized to receive or deposit WIA/WtW funds or to issue financial documents, checks or other instruments of payment of program costs.</li> </ul>	
<b>3. Describe the source of non-federal funds your organization would use if disallowed costs had to be repaid to the Federal Government?</b>	
<b>SUPPORTIVE SERVICE</b>	

<p><b>1. How does your organization ensure that the following supportive service requirements are met:</b></p> <ul style="list-style-type: none"> <li>• Participants receive accurate information about the availability of supportive services, limitations on the provisions of such services, and procedures to allow exceptions to the limitations imposed by the local area?</li> <li>• Resources and services are coordinated in the local area for the provision of supporting services for adult, WtW participants and dislocated workers?</li> <li>• Supportive services are only provided when they are necessary to enable individuals to participate?</li> </ul>	
<p><b>2. How does your local area determine the level of needs-related payments and verify the eligibility requirements for adults and dislocated workers to receive needs-related payments with locally developed policy?</b></p>	
<b>PERSONNEL</b>	
<p><b>1. Were there any new hires during the time period selected for review _____ to _____?</b></p>	
<p><b>2. Are there written job descriptions?</b></p>	
<p><b>3. Are cash advances allowed?</b></p>	
<p><b>4. Describe payroll check disbursement procedures.</b></p> <ul style="list-style-type: none"> <li>• Other checks?</li> </ul>	
<p><b>5. How are additions, deletions and changes documented in files, who approves?</b></p> <p>(i.e. changes in marital status, deductions, benefits etc.)</p>	

Documents:

The monitoring team will test approximately 25-30 transactions within your accounting system. Please provide the following documentation:

1. Copy of Accounts (codes)
2. Check register
3. Organizations certificate of insurance or evidence of self-insurance for the following:
  - Professional liability resulting from errors, omissions, or negligent acts of the officers, employees or agents.
  - Motor Vehicle
  - Property Insurance
  - Workers Compensation Insurance
  - Bonding Coverage (officer, director, director or employee authorized to receive or deposit WIA/WtW funds or to issue financial documents, checks, or other instruments of payment of program costs)
4. Authority (i.e. Executive Order from Mayor authorizing fund administration)
5. Lease Agreement
6. Contracts
7. Sample of randomly selected employee Time and Attendance, W-4 for the time period under review \_\_\_\_\_ to \_\_\_\_\_.
8. Written policies and procedures.
9. Most recent audit report
10. Workforce Investment Board current by-laws

## Fiscal Procedures Worksheet

### A. INTERNAL CONTROLS

worksheet  
example

	YES	NO
1. Does the grantee appear to have an adequate internal control system?	<input type="checkbox"/>	<input type="checkbox"/>
2. Are there written policies/procedures for the internal control system?	<input type="checkbox"/>	<input type="checkbox"/>
3. Do the policies/procedures comply with applicable regulatory requirements?	<input type="checkbox"/>	<input type="checkbox"/>
4. Is there adequate separation of duties throughout the grantee's accounting functions?	<input type="checkbox"/>	<input type="checkbox"/>
5. Are there proper controls to prevent duplicate payments?	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS:

### B. DISBURSEMENTS

1. What controls are in place for issuing checks?		
2. Is there a division of responsibilities in the disbursement function?	<input type="checkbox"/>	<input type="checkbox"/>
3. Are purchase orders, related vouchers, and checks pre-numbered?	<input type="checkbox"/>	<input type="checkbox"/>
4. Are checks drawn to cash prohibited?	<input type="checkbox"/>	<input type="checkbox"/>
5. Are procedures in place to prevent duplication of payment?	<input type="checkbox"/>	<input type="checkbox"/>
6. Are credit cards issued to staff?	<input type="checkbox"/>	<input type="checkbox"/>
If Yes:		
Are personal charges allowed?	<input type="checkbox"/>	<input type="checkbox"/>
Are controls established?	<input type="checkbox"/>	<input type="checkbox"/>
7. What controls are in place to ensure that all disbursements are recorded in the accompanying system?		
8. Are cash disbursements supported and justified by adequate documentation?	<input type="checkbox"/>	<input type="checkbox"/>

- |  |                      |                      |
|--|----------------------|----------------------|
| 9. Are the costs reviewed charged to correct cost categories?      | <input type="text"/> | <input type="text"/> |
| 10. Who is responsible for ensuring that costs are allowable?      |                      |                      |
| 11. Are costs determined to be allowable before payments are made? | <input type="text"/> | <input type="text"/> |
| 12. Does the grantee advance any funds to any sub-contractor?      | <input type="text"/> | <input type="text"/> |
| 13. Are training costs paid by any means other than ITA?           | <input type="text"/> | <input type="text"/> |

If yes:

Describe payment mechanisms allowed other than ITAs for adults and dislocated workers.

COMMENTS:

### C. FINANCIAL REPORTING

- |   |                      |                      |
|---|----------------------|----------------------|
| 1. Are monthly financial reports submitted in a timely manner?                            | <input type="text"/> | <input type="text"/> |
| 2. Are expenditures reported on an accrual basis?   | <input type="text"/> | <input type="text"/> |
| 3. Is reported data extracted from the accounting system traceable to the general ledger? | <input type="text"/> | <input type="text"/> |
| 4. Are administrative costs being reported as required?                                   | <input type="text"/> | <input type="text"/> |
| 5. Are obligations of funds reported?   | <input type="text"/> | <input type="text"/> |

COMMENTS:

### D. ACCOUNTING SYSTEM

- |   |                      |                      |
|---|----------------------|----------------------|
| 1. Are monthly trial balances of the books of account current and available for review? | <input type="text"/> | <input type="text"/> |
| 2. Is the general ledger supported with entry descriptions?                             | <input type="text"/> | <input type="text"/> |
| 3. Does the financial manager periodically review journal entries?                      | <input type="text"/> | <input type="text"/> |



4. What is the latest month for which accounting records are available:
5. Does the accrued expenditure sample balance with the bank account? \_\_\_\_\_ \_\_\_\_\_
6. Do financial reports submitted to the NDOL balance to the books of accounts? \_\_\_\_\_ \_\_\_\_\_
7. Are funds transferred from one bank account to another? \_\_\_\_\_ \_\_\_\_\_
8. What documentation is required to support the transfer?
9. Describe how program income is tracked:
10. Describe how revenue is handled:
11. Does the local board have the required systems prescribed by 29CFR Part 97 & Part 95 for the following?
 

Contract Management	_____	_____
Property Management	_____	_____
Audit and Resolution	_____	_____
Debt Collection	_____	_____
Record Retention	_____	_____
12. Has the local board established accounting procedures to ensure ITA funds are properly tracked and used? \_\_\_\_\_ \_\_\_\_\_

COMMENTS:

#### **E. ADMINISTRATIVE & INDIRECT COSTS**

1. Enter the grantee's administrative cost limitation:  
\$ \_\_\_\_\_
2. Enter the amount expended for administrative costs:  
\$ \_\_\_\_\_
3. Has the administrative cost limitation been exceeded? \_\_\_\_\_ \_\_\_\_\_
4. Does the grantee have multiple grants or other funding sources? \_\_\_\_\_ \_\_\_\_\_
5. Does the grantee charge costs to the program fund based on a current indirect cost rate or cost allocation plan? \_\_\_\_\_ \_\_\_\_\_

Review a selected number of monthly allocations or rate applications to determine compliance with the plan.        of        Reviewed

7. Does the sample allocation balance to the books of account?              

8. How are administrative costs handled?

9. Are indirect costs identifiable to ensure that unallowable cost items are not included?              

10. Does the local board allow contractors to charge indirect costs?              

If yes, are cost allocation plans on file and reviewed by local board?              

11. Does the local boards employ the use of cost pools other than Indirect/Shared?              

If yes, what is the basis for charging to the pool?

What is the basis for distribution from the pool?

12. How does the administrative entity charge expenditures to the program?

Direct         
Indirect         
Combination of both       

Check items included in the indirect pools:

salaries & benefits	<u>      </u>	rent/depreciation	<u>      </u>
utilities	<u>      </u>	office equipment	<u>      </u>
auto expense	<u>      </u>	copy machine	<u>      </u>
postage	<u>      </u>	insurance	<u>      </u>
travel	<u>      </u>	other	<u>      </u>

What is the basis for allocation of the following:

space:

utilities:

copies:

telephone:

travel:

other routine expenses:

COMMENTS:

## F. PERSONNEL COST DOCUMENTATION

- |  |                          |                          |
|--|--------------------------|--------------------------|
| 1. Does the grantee have written policies/procedures for employee time and attendance records? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Are payrolls initiated through the submittal of time and attendance timesheet?              | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Do procedures require the employee and the supervisor to sign timesheet?                    | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.. Does the grantee have written policies/procedures for preparing activity reports?          | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do activity reports reflect actual rather than planned activity?                            | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Do the employee and the supervisor sign activity reports?                                   | <input type="checkbox"/> | <input type="checkbox"/> |

COMMENTS:

## G. PROGRAM INCOME

1. Total amount of program income earned:  
\$
2. Briefly describe program income. How does grantee account for earned and used income?
3. Is grantee in compliance with regulatory requirements for program income? ☐ ☐
4. Has program income been correctly reported on monthly financial reports? ☐ ☐

COMMENTS:

## H. CASH MANAGEMENT

- |  |                          |                          |
|--|--------------------------|--------------------------|
| 1. Are bank statements reconciled with the books of account monthly? | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|

C:\Documents and Settings\dave.pedersen\Desktop\WIA Monitor Manual.docPage 163 of 211

2. Do bank reconciliation procedures provide for:

- accounting for all check numbers used
- identifying outstanding checks
- investigating all checks outstanding \_\_\_\_ days or more
- voicing outstanding checks after a reasonable amount of time
- tracing transfers to/from bank accounts/fund accounts
- comparing the account balance with the general ledger cash balance


3. Is the grantee in compliance with daily cash-on-hand requirements?

--	--

4. How often is petty cash reconciled?

5. Are petty cash reimbursements properly approved and controlled?

--	--

6. Have there been any transfers between funding streams?

--	--

## I. RECORD KEEPING

1. Do financial records appear current, accurate, organized and complete?

--	--

2. Does the grantee maintain adequate documentation to support or justify expenditures?

--	--

3. Is the grantee in compliance with the three-year record retention requirement?

--	--

4. Is the grantee in compliance with financial record requirements?

--	--



**Payment Worksheet Financial Oversight Review**  
**Accounting Records**

**FROM DISBURSEMENT JOURNAL:**  
**COMMENT**

**CHECK**

**BASED ON (SUPPORT DOCUMENTATION):**

Check #	\$ Amount	Date	Cost Category	PAYEE	Check ?	Accuracy?	Purpose	Allowable?	Invoices?	Adequate?	Discount?	Authorized?	Check #?	Cost	
1.															
2.															
3.															
4.															
5.															
6.															
7.															
8.															
9.															
10.															
11.															
12.															
13.															
14.															
15.															
16.															
17.															
18.															
19.															
20.															
21.															
22.															
23.															
24.															

Check #	\$ Amount	Date	Cost Category	PAYEE	Check ?	Accuracy?	Purpose	Allowable?	Invoices?	Adequate?	Discount?	Authorized?	Check #?	Cost	
25.															
26.															
27.															
28.															
29.															

## **M. PROPERTY MANAGEMENT MONITOR PLAN**

**29CFR667**

**29CFR95**

**29CFR97**

**WIA 184, 188, 193, 195**

**OMB Circulars**

**State WIA Policies**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct an annual desk review of local area policies and practices of property management for compliance with Workforce Investment Act (WIA), regulations, and State Policies. Areas of examination will include inventory, property management procedures and related record keeping practices.

**Documents:** The following documents will be reviewed as a part of this review:

1. Inventory Records
2. Property Management Policy
3. Most recent physical inventory report.

**Questions:** The following questions will be addressed in this review:

1. Does the local area have a property management system that meets requirements?
2. Does the local area have an inventory system that meets requirements?
3. Is a physical inventory completed every two- (2) years?
4. Are property records maintained for three (3) years after final reporting?
5. Has any property purchased with WIA monies been disposed of since the last review?



## M.

### PROPERTY MANAGEMENT WORKSHEET

#### Real Property

YES NO

(Real property is defined as land, buildings and other permanent improvements to land or buildings.)

1. Have program funds been used to acquire or make permanent improvements to real property?

worksheet

--	--

Equipment and Supplies  
example

2. Has computer hardware/software been purchased with program funds?

--	--

3. Do property management policies/procedures require:

- use fees are considered where appropriate
- physical inventories to be conducted and the results reconciled with property records at least bi-annually
- adequate maintenance to keep the property serviceable

--	--

--	--

--	--

4. Does the property management system:

- track property items from acquisition until disposition
- require the use of identification tags

--	--

--	--

5. Do property records contain:

- a description of property
- model numbers/serial numbers
- funding source
- acquisition date
- cost of property
- location of property
- condition of property
- disposition data, including the date of sale, loss, theft, etc.

--	--

--	--

--	--

--	--

--	--

--	--

--	--

--	--

6. Is there a control system to prevent loss, damage, or theft of the property?

--	--

7. In the opinion of the monitor, does it appear the property management system is adequate?

--	--

COMMENTS:

## **N. Procurement Standards Review Plan**

**WIA 112, 117, 121 123, 184,**

**20 CFR 664.610, 667.200**

**29 CFR Parts 95, 97, and 98**

**TEGL 9-00 (Youth Programs)**

**State Workforce Investment Plan**

**State Policy Issuance**

**Purpose:** Review the process to award funds and deliver goods and services to ensure processes meet the federal, state and local procurement standards.

**Documents:** These documents will be examined as a part of the review:

1. State Plan
2. Local Board Plan
3. State Policy Issuances
4. Contracts, agreements, or similar documents
5. Procurement procedures and documentation
6. Federal and/or state and/or city requirements, laws and regulations.

**Interviews:** This review will include staff interviews.

### **Questions:**

1. Does the Local Area have written procurement procedures?
2. Do the procedures meet the requirements of the Workforce Investment Act?
3. Do the procedures meet the requirements of the federal and / or state and / or city procedures?  
Including the following areas: Administration Systems, Affirmative Action, Bonding, Codes of Conduct / Conflict of Interest, Competition, Confidentiality and Non-Disclosure, Contract Provisions, Cost Analysis, Debarred and Suspended Parties, Documentation and Awarding Agency Review, Economy and Efficiencies, Methods of Procurement, Protest Procedures, and Transactions between Units of Government.
4. Have One-Stop operators been properly designated and certified?
5. Have funds for youth activities been awarded competitively or within the allowed exceptions?
6. Has the Local Board applied for a waiver to deliver in house programs? (if so, an additional review will be completed.)
7. Are records available and maintained for the required time?

## **N. Procurement Standards (Revised July 2008)**

### **29 CFR 97**

#### Worksheet and Federal Citation

Background: 29CFR97 contains the procurement standard for recipients to use to establish procurement procedure. The regulation is cited and review questions follow each section.

#### **State Procurement Questions: NOT APPLICABLE - LOCAL AREA REVIEW**

##### **Sec. 97.36 Procurement.**

**(a) States.** When procuring property and services under a grant, a State will follow the same policies and procedures it uses for procurements from its non-Federal funds. The State will ensure that every purchase order or other contract includes any clauses required by Federal statutes and executive orders and their implementing regulations. Other grantees and subgrantees will follow paragraphs (b) through (i) in this section.

<b>Yes</b>	<b>No</b>	
<input type="checkbox"/>	<input type="checkbox"/>	1. <b>Does the state have policies and procedures in place for non federal grant procurements. Describe:</b>
<input type="checkbox"/>	<input type="checkbox"/>	2. <b>Does the state use these policies for procurement under the grant?</b>

#### **Grantee and Subgrantee Questions**

##### **(b) Procurement standards.**

(1) Grantees and subgrantees will use their own procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section.

<b>Yes</b>	<b>No</b>	
<input type="checkbox"/>	<input type="checkbox"/>	1. <b>Does the local area have procurement procedures? Describe:</b>
<input type="checkbox"/>	<input type="checkbox"/>	2. <b>Does the procedure reflect State, local, and Federal law and standards? (how does the grantee determine this)</b>

(2) Grantees and subgrantees will maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Yes No

— — — 1. **What system is used to ensure contractors perform according to the contract? ( Who is responsible? How is performance determined? What is done if the contractor is not performing? )**

(3) Grantees and subgrantees will maintain a written code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts. No employee, officer or agent of the grantee or subgrantee shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

- (i) The employee, officer or agent,
- (ii) Any member of his immediate family,
- (iii) His or her partner, or
- (iv) An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm selected for award. The grantee's or subgrantee's officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to subagreements. Grantee and subgrantees may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value. To the extent permitted by State or local law or regulations, such standards or conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the grantee's and subgrantee's officers, employees, or agents, or by contractors or their agents. The awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest.

### Conflict of Interest Questions

Yes	No		
—	NA	—	1. <b>Grantee = DOES NOT APPLY SUBGRANTEE Under Review</b> <b>Does the grantee( ) have a written code of standards of conduct? (Has a copy been provided?)</b>

**N.**

- |     |     |    |  |
|-----|-----|----|--|
| ___ | ___ | 2. | <b>Does the code prohibit any employee, officer or agent of the grantee ( _____ ) from participating in the selection, or award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent is involved?</b> (A conflict is defined as a financial interest in the contracting firm held by grantee's employee, officer or agent or by any member of the immediate family or by the partner of the grantee's employee, officer or agent. A definition of conflict also includes an organization that employs or is about to employ the grantees employee, officer or agent , or member of the immediate family or partner.) |
| ___ | ___ | 3. | <b>Has the grantee( _____ ) prohibited the solicitation of gratuities, favors or any thing of monetary value from contractors, potential contractors, or parties agreements?</b>   |
| ___ | ___ | 4. | <b>Has the grantee( _____ ) made provisions gifts or considerations of nominal value?</b>  |
| ___ | ___ | 5. | <b>Does the standard of conduct provide for penalties, sanctions or other disciplinary action for violations of the grantee's( _____ ) standards?</b>  |

**Yes      No**

- |     |     |    |   |
|-----|-----|----|---|
| ___ | ___ | 1. | <b><u>Subgrantee</u></b><br><b>Does the subgrantee( _____ ) have a written code of standards of conduct?</b> (Has a copy been provided?)  |
| ___ | ___ | 2. | <b>Does the code prohibit any employee, officer or agent of the subgrantee ( <u>Lincoln</u> _____ ) from participating in the selection, or award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent is involved?</b> (A conflict is defined as a financial interest in the contracting firm held by grantee's employee, officer or agent or by any member of the immediate family or by the partner of the grantee's employee, officer or agent. A definition of conflict also includes an organization that employs or is about to employ the grantees employee, officer or agent, or member of the immediate family or partner.) |

\_\_\_ \_\_\_ 3. **Has the subgrantee(\_\_\_\_\_) prohibited the solicitation of gratuities, favors or any thing of monetary value from contractors, potential contractors, or parties subagreements?**

\_\_\_ \_\_\_ 4. **Has the subgrantee (\_made provisions gifts or considerations of nominal value?**

\_\_\_ \_\_\_ 5. **Does the standard of conduct provide for penalties, sanctions or other disciplinary action for violations of the subgrantee's(\_\_\_\_\_) standards?**

(4) Grantee and subgrantee procedures will provide for a review of proposed procurements to avoid purchase of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

\_\_\_ \_\_\_ 6. **Is there a review process for proposed procurements to avoid unnecessary /duplication of procurements?  
(Who is responsible for this review?)**

\_\_\_ \_\_\_ 7. **Is consideration given to consolidation/break out lease versus purchase and other analysis to ensure economy? (Who is responsible and what are the determining factors?)**

(5) To foster greater economy and efficiency, grantees and subgrantees are encouraged to enter into State and local intergovernmental agreements for procurement or use of common goods and services.

\_\_\_ \_\_\_ 8. **Does the subgrantee Greater have an intergovernmental agreement to procure or use common goods and services?  
Describe:**

(6) Grantees and subgrantees are encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

(7) Grantees and subgrantees are encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

\_\_\_\_ 9. **Does subgrantee \_\_\_\_\_ LWIA have provisions to encourage the use of Federal surplus or value engineering? (only if applies)**

(8) Grantees and subgrantees will make awards only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

\_\_\_\_ 10. **Does the local area have a process to determine if the contractor is responsible? Describe**

(9) Grantees and subgrantees will maintain records sufficient to detail the significant history of a procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

\_\_\_\_ 11. **Does the subgrantee maintain procurement history records.**  
\_\_\_\_ Rationale for method  
\_\_\_\_ Selection of contract type  
\_\_\_\_ Contractor selection/rejection  
\_\_\_\_ Basis of price

(10) Grantees and subgrantees will use time and material type contracts only—

- (i) After a determination that no other contract is suitable, and
- (ii) If the contract includes a ceiling price that the contractor exceeds at its own risk.

(11) Grantees and subgrantees alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not

limited to source evaluation, protests, disputes, and claims. These standards do not relieve the grantee or subgrantee of any contractual responsibilities under its contracts. Federal agencies will not substitute their judgment for that of the grantee or subgrantee unless the matter is primarily a Federal concern. Violations of law will be referred to the local, State, or Federal authority having proper jurisdiction.

(12) Grantees and subgrantees will have protest procedures to handle and resolve disputes relating to their procurements and shall in all instances disclose information regarding the protest to the awarding agency. A protestor must exhaust all administrative remedies with the grantee and subgrantee before pursuing a protest with the Federal agency. Reviews of protests by the Federal agency will be limited to:

- (i) Violations of Federal law or regulations and the standards of this section (violations of State or local law will be under the jurisdiction of State or local authorities) and
- (ii) Violations of the grantee's or subgrantee's protest procedures for failure to review a complaint or protest. Protests received by the Federal agency other than those specified above will be referred to the grantee or subgrantee.

\_\_\_\_\_ 12. **Does the grantee\_\_\_\_\_ Local Area have written protest procedures? Describe:** (Where are protest procedures available? Who is responsible? How can a protest be filed?)

\_\_\_\_\_ 13. **Does the local area have any pending protest.**  
None.

\_\_\_\_\_ 14. **Have they notified the awarding agency?**

**(c) Competition.** (1) All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards of Sec. 97.36. Some of the situations considered to be restrictive of competition include but are not limited to:

- (i) Placing unreasonable requirements on firms in order for them to qualify to do business,
- (ii) Requiring unnecessary experience and excessive bonding,
- (iii) Noncompetitive pricing practices between firms or between affiliated companies,
- (iv) Noncompetitive awards to consultants that are on retainer contracts,
- (v) Organizational conflicts of interest,
- (vi) Specifying only a ``brand name" product instead of allowing ``an equal" product to be offered and describing the performance of other relevant requirements of the procurement, and
- (vii) Any arbitrary action in the procurement process.



\_\_\_\_\_ 15. Does the grantee local area have process to ensure open competition? If the answer is no, describe the restrictions on competition.

(2) Grantees and subgrantees will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed in State or local geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts State licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criteria provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

\_\_\_\_\_ 16. Does the local are avoid imposing geographical preferences?

(3) Grantees will have written selection procedures for procurement transactions. These procedures will ensure that all solicitations:

- (i) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured, and when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. (7/06) Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a ``brand name or equal'' description may be used as a means to define the performance or other salient requirements of a procurement. The specific features of the named brand which must be met by offerors shall be clearly stated; and
- (ii) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

\_\_\_\_\_ 17. Does the written procurement selection process meet the standard?

(4) Grantees and subgrantees will ensure that all prequalified lists

of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, grantees and subgrantees will not preclude potential bidders from qualifying during the solicitation period.

\_\_\_\_\_ 18. Does the process provide for a prequalified list and allow qualification in the solicitation period?

(d) Methods of procurement to be followed--(1) Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold fixed at 41 U.S.C. 403(11) (currently set at \$100,000). If small purchase procedures are used, price or rate quotations shall be obtained from an adequate number of qualified sources.

(2) Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in Sec. 97.36(d)(2)(i) apply.

(i) In order for sealed bidding to be feasible, the following conditions should be present:

- (A) A complete, adequate, and realistic specification or purchase description is available;
- (B) Two or more responsible bidders are willing and able to compete effectively and for the business; and
- (C) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(ii) If sealed bids are used, the following requirements apply:

- (A) The invitation for bids will be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids;
- (B) The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond;
- (C) All bids will be publicly opened at the time and place prescribed in the invitation for bids;
- (D) A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and

(E) Any or all bids may be rejected if there is a sound documented reason.

**(3) Procurement by competitive proposals.**

**The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:**

- (i) Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;
  - (ii) Proposals will be solicited from an adequate number of qualified sources;
  - (iii) Grantees and subgrantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees;
  - (iv) Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and
  - (v) Grantees and subgrantees may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.
- (4) Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.
- (i) Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one of the following circumstances applies:
    - (A) The item is available only from a single source;
    - (B) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
    - (C) The awarding agency authorizes noncompetitive proposals; or
    - (D) After solicitation of a number of sources, competition is determined inadequate.
  - (ii) Cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits, is required.
  - (iii) Grantees and subgrantees may be required to submit the proposed procurement to the awarding agency for pre-award review in accordance with paragraph (g) of this section.

17. Does the written procedure provide for the procurement methods? What documentation is maintained?

(e) Contracting with small and minority firms, women's business enterprise and labor surplus area firms. (1) The grantee and subgrantee will take all necessary affirmative steps to assure that minority firms, women's business enterprises, and labor surplus area firms are used when

possible.

**(2) Affirmative steps shall include:**

- (i) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;**
- (ii) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;**
- (iii) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business, and women's business enterprises;**
- (iv) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises;**
- (v) Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce; and**
- (vi) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (e)(2) (i) through (v) of this section.**

**18. Does the procurement procedure address affirmative action requirements? What documentation is maintained?**

**(f) Contract cost and price.**

(1) Grantees and subgrantees must perform a cost or price analysis in connection with every procurement action including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, grantees must make independent estimates before receiving bids or proposals. A cost analysis must be performed when the offeror is required to submit the elements of his estimated cost, e.g., under professional, consulting, and architectural engineering services contracts. A cost analysis will be necessary when adequate price competition is lacking, and for sole source procurements, including contract modifications or change orders, unless price reasonableness can be established on the basis of a catalog or market price of a commercial product sold in substantial quantities to the general public or based on prices set by law or regulation. A price analysis will be used in all other instances to determine the reasonableness of the proposed contract price.

(2) Grantees and subgrantees will negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration will be given to the complexity of the work to be performed, the risk borne by the grants will be allowable only to the extent that costs incurred or cost contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

**(3) Costs or prices based on estimated costs for contracts under**

grants will be allowable only to the extent that costs incurred or cost estimates included in negotiated prices are consistent with Federal cost principles (see Sec. 97.22). Grantees may reference their own cost principles that comply with the applicable Federal cost.

(4) The cost plus a percentage of cost and percentage of construction cost methods of contracting shall not be used.

## **19. Does the procurement procedure meet the cost and price standards? What documentation is maintained?**

### **(g) Awarding agency review.**

(1) Grantees and subgrantees must make available, upon request of the awarding agency, technical specifications on proposed procurements where the awarding agency believes such review is needed to ensure that the item and/or service specified is the one being proposed for purchase. This review generally will take place prior to the time the specification is incorporated into a solicitation document. However, if the grantee or subgrantee desires to have the review accomplished after a solicitation has been developed, the awarding agency may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.

(2) Grantees and subgrantees must on request make available for awarding agency pre-award review procurement documents, such as requests for proposals or invitations for bids, independent cost estimates, etc. when:

- (i) A grantee's or subgrantee's procurement procedures or operation fails to comply with the procurement standards in this section; or
- (ii) The procurement is expected to exceed the simplified acquisition threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation; or
- (iii) The procurement, which is expected to exceed the simplified acquisition threshold, specifies a "brand name" product; or
- (iv) The proposed award is more than the simplified acquisition threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or
- (v) A proposed contract modification changes the scope of a contract or increases the contract amount by more than the simplified acquisition threshold.

(3) A grantee or subgrantee will be exempt from the pre-award review in paragraph (g)(2) of this section if the awarding agency determines that its procurement systems comply with the standards of this section.

(i) A grantee or subgrantee may request that its procurement system be reviewed by the awarding agency to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews shall occur where there is a continuous high-dollar funding, and third-party contracts are awarded on a regular basis.

(ii) A grantee or subgrantee may self-certify its procurement system. Such self-certification shall not limit the awarding agency's

right to survey the system. Under a self-certification procedure, awarding agencies may wish to rely on written assurances from the grantee or subgrantee that it is complying with these standards. A grantee or subgrantee will cite specific procedures, regulations, standards, etc., as being in compliance with these requirements and have its system available for review.

— — **20. Do the procurement procedures provide for review by the granting agency?**

**(h) Bonding requirements.**

For construction or facility improvement contracts or subcontracts exceeding the simplified acquisition threshold, the awarding agency may accept the bonding policy and requirements of the grantee or subgrantee provided the awarding agency has made a determination that the awarding agency's interest is adequately protected. If such a determination has not been made, the minimum requirements shall be as follows:

(1) A bid guarantee from each bidder equivalent to five percent of the bid price. The "bid guarantee" shall consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of his bid, execute such contractual documents as may be required within the time specified.

performance bond on the part of the contractor for 100 percent of the contract price. A "performance bond" is one executed in connection with a contract to secure fulfillment of all the contractor's obligations under such contract.

(3) A payment bond on the part of the contractor for 100 percent of the contract price. A "payment bond" is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

— — **21. Does the procurement procedure describe bonding requirements?**

— — **22. Do the bonding requirement meet the minimum standards?**

**(i) Contract provisions.**

A grantee's and subgrantee's contracts must contain provisions in paragraph (i) of this section.

Federal agencies are permitted to require changes, remedies, changed conditions, access and records retention, suspension of work, and other clauses approved by the Office of Federal Procurement Policy.

(1) Administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such

sanctions and penalties as may be appropriate. (Contracts more than the simplified acquisition threshold)

(2) Termination for cause and for convenience by the grantee or subgrantee including the manner by which it will be effected and the basis for settlement. (All contracts in excess of \$10,000)

(3) Compliance with Executive Order 11246 of September 24, 1965, entitled "Equal Employment Opportunity," as amended by Executive Order 11375 of October 13, 1967, and as supplemented in Department of Labor regulations (41 CFR chapter 60). (All construction contracts awarded in excess of \$10,000 by grantees and their contractors or subgrantees)

(4) Compliance with the Copeland "Anti-Kickback" Act (18 U.S.C. 874) as supplemented in Department of Labor regulations (29 CFR Part 3). (All contracts and subgrants for construction or repair)

(5) Compliance with the Davis-Bacon Act (40 U.S.C. 276a to 276a-7) as supplemented by Department of Labor regulations (29 CFR Part 5). (Construction contracts in excess of \$2000 awarded by grantees and subgrantees when required by Federal grant program legislation)

(6) Compliance with Sections 103 and 107 of the Contract Work Hours and Safety Standards Act (40 U.S.C. 327-330) as supplemented by Department of Labor regulations (29 CFR Part 5). (Construction contracts awarded by grantees and subgrantees in excess of \$2000, and in excess of \$2500 for other contracts which involve the employment of mechanics or laborers)

(7) Notice of awarding agency requirements and regulations pertaining to reporting.

(8) Notice of awarding agency requirements and regulations pertaining to patent rights with respect to any discovery or invention which arises or is developed in the course of or under such contract.

(9) Awarding agency requirements and regulations pertaining to copyrights and rights in data.

(10) Access by the grantee, the subgrantee, the Federal grantor agency, the Comptroller General of the United States, or any of their duly authorized representatives to any books, documents, papers, and records of the contractor which are directly pertinent to that specific contract for the purpose of making audit, examination, excerpts, and transcriptions.

(11) Retention of all required records for three years after grantees or subgrantees make final payments and all other pending matters are closed.

(12) Compliance with all applicable standards, orders, or requirements issued under section 306 of the Clean Air Act (42 U.S.C. 1857(h)), section 508 of the Clean Water Act (33 U.S.C. 1368), Executive Order 11738, and Environmental Protection Agency regulations (40 CFR



part 15). (Contracts, subcontracts, and subgrants of amounts in excess of \$100,000)

(13) Mandatory standards and policies relating to energy efficiency which are contained in the state energy conservation plan issued in compliance with the Energy Policy and Conservation Act (Pub. L. 94-163, 89 Stat. 871). [53 FR 8069, Mar. 11, 1988, as amended at 60 FR 19639, 1995, Apr. 19, 1995]

\_\_\_\_\_ **23. Does the procedure call for the 13 assurances to be in the contracts?**

Sec. 97.37 Subgrants.

(a) States. States shall follow state law and procedures when awarding and administering subgrants (whether on a cost reimbursement or fixed amount basis) of financial assistance to local and Indian tribal governments. States shall:

- (1) Ensure that every subgrant includes any clauses required by Federal statute and executive orders and their implementing regulations;
- (2) Ensure that subgrantees are aware of requirements imposed upon them by Federal statute and regulation;
- (3) Ensure that a provision for compliance with Sec. 97.42 is placed in every cost reimbursement subgrant; and
- (4) Conform any advances of grant funds to subgrantees substantially to the same standards of timing and amount that apply to cash advances by Federal agencies.

(b) All other grantees. All other grantees shall follow the provisions of this part which are applicable to awarding agencies when awarding and administering subgrants (whether on a cost reimbursement or fixed amount basis) of financial assistance to local and Indian tribal governments. Grantees shall:

- (1) Ensure that every subgrant includes a provision for compliance with this part;
- (2) Ensure that every subgrant includes any clauses required by Federal statute and executive orders and their implementing regulations; and
- (3) Ensure that subgrantees are aware of requirements imposed upon them by Federal statutes and regulations.

(c) Exceptions. By their own terms, certain provisions of this part do not apply to the award and administration of subgrants:

- (1) Section 97.10;
- (2) Section 97.11;
- (3) The letter-of-credit procedures specified in Treasury Regulations at 31 CFR part 205, cited in Sec. 97.21; and
- (4) Section 97.50.

PER MB 12/30/02 in this instance "subgrantee" is the local area, grantee is the state - not under review. Questions apply

**O. MIS (Management Information System) Monitor Plan**  
**WIA 134, 185**  
**20 CFR 667,666**  
**TREX (Tracking and Retrieval Exchange – NE MIS System) Manual**  
**State Plan**  
**State Policy**

**Purpose:** Nebraska Department of Labor, Office of General Counsel program monitor will conduct oversight of use of the MIS (Management Information Systems) to collect informational data necessary for reporting. All reviews automatically review a sample of MIS reports against the information in the participant file. If an excess number of errors are noted, the scope of the review will be expanded to identify the problem and to determine if corrective action is needed.

**Documents:** The following documents will be examined as part of this review:

5. MIS Manual
6. MIS printouts
7. Participant files
8. Fiscal reports

**Interviews:** Staff may be interviewed in person or by phone if determined necessary upon completion of a desk review. Content of interviews will be designed to clarify or resolve the problem in question.

**Questions:** The following questions will be addressed:

5. How is the MIS system coordinated with local areas to assure that information is current and up to date?
6. Does the local area have a system in place to ensure that data is entered in an accurate and timely fashion?
7. Does the Administrative Office receive information from the local area as required for federal reports?
8. Does the local area have a system in place, which identifies at what point registration is completed?

**O.**

**MIS Interview Questions**

1. What procedures are in place for entry into TREX?
- Timeframe
  - Who Does
2. If CSRs are not entering “live”, why not?
3. Are applicants entered into TREX?
4. If not, where are those who apply but are not enrolled recorded?
- Need copy of records
5. Copy of statistics for first quarter enrollments WMS is working with.

# Worksheet

## example

- example

example

- example

example

- example

example

### ONSITE REVIEW

Comparison of participant files to MIS:

Do the following match: (check if yes, note discrepancy if no)

worksheet  
example

<u>Name</u> <u>SS#</u>	<u>TREX</u> <u>Date</u>	<u>NWAS</u> <u>Date</u>	<u>Age</u>	<u>Sex</u>	<u>Citizens</u> <u>hip</u>	<u>Race</u>	<u>Disabled</u>	<u>Labor</u>	<u>TANF</u>	<u>FDST</u>	<u>Grade</u> <u>Level</u>	<u>Read</u>	<u>Math</u>	<u>Drop</u> <u>Out</u>	<u>Youth</u>	<u>Econ</u>



**P. Eligible Training Provider Monitor Plan**  
**20 CFR663.505- 508**  
**State WIA Policy**  
**State Plan**

**Purpose:** NDOL, Office of General Counsel Program Monitor will conduct oversight of the policies and procedures for development and maintenance of the Eligible Training Provider List. This review will include an examination of the NDOL office responsible for the computerized list and the means of information sharing at the state level. The review will also address the responsibilities and activities of the local board. The review will be conducted as a desk review with the local workforce investment areas supplying information and documentation. Program monitors reserve the right to an additional onsite review if information provided indicates the necessity.

**Documents:** These documents will be reviewed as part of this review:

Provider List: State and Local

Policies: State and Local

Provider application

Performance Information

Local Workforce Investment Board related records

State Workforce Investment Board related records

MIS Printouts

**Local Information: Questionnaires** will be completed by the following as needed:

One-Stop Staff

Provider

NDOL-DOL Staff

**Questions:** These questions will be addressed by this review:

1. Have the Eligible Training Providers met the requirements to be an eligible provider within the last twelve (12) months? If not, reason for exception.
2. Do the courses of training offer the opportunity for a degree, certification or occupations skills recognized by employers if successfully completed?
3. Does the local board have systems in place for soliciting applications, accepting applications and determining provider eligibility?
4. Does the local board compile a list of local eligible providers, collect performance information and program cost information?
5. How is the Eligible training provider made available to individuals who have been determined eligible for training services?
6. In the One-Stop environment how is the Eligible Training Provider List made available to partner customers?
7. How does the local board and state entity collect performance information? What procedures are used to verify accuracy of submitted performance information?
8. How does the State in cooperation with the local board remove programs that do not meet performance standards from the Eligible Training Provider List?
9. Does the local board require additional information, above State requirements from training providers?

**P. Eligible Training Provider Monitor Plan**  
**20 CFR663.505- 508**  
**State WIA Policy**  
**State Plan**

1. Have the Eligible Training Providers met the requirements to be an eligible provider within the last twelve (12) months? If not, reason for exception.
2. Do the courses of training offer the opportunity for a degree, certification or occupations skills recognized by employers if successfully completed?  
*Explain:*
3. Does the local board have systems in place for soliciting applications, accepting applications and determining provider eligibility?  
*Comments:*
4. Does the local board compile a list of local eligible providers, collect performance information and program cost information?  
*Describe:*
5. How is the Eligible training provider made available to individuals who have been determined eligible for training services?  
*Explain:*
6. In the One-Stop environment how is the Eligible Training Provider List made available to partner customers?  
*Describe:*
7. How does the local board and state entity collect performance information? What procedures are used to verify accuracy of submitted performance information?  
*Describe:*
8. How does the State in cooperation with the local board remove programs that do not meet performance standards from the Eligible Training Provider List?  
*Describe:*
9. Does the local board require additional information, above State requirements from training providers?  
*Describe:*



**Q. Additional Reviews and Alternate Reviews  
(Additional Reviews and Alternate Reviews  
will be filled under the Heading Q.)**

**1. Data Validation Process**

**2. ARRA Youth**

## WIA MONITOR DATA VALIDATION PROCESS

### I) PURPOSE

Data element validation evaluates the accuracy of the participant data used to generate the WIA Annual reports. The process compares selected information from a sample of exit records to source documentation. Data element validation is critical to ensure that the performance results of the WIA programs are reasonably accurate.

If a record is selected for validation, validator(s), most often state monitoring staff, compare the record against the source documentation for each data element and then record on a worksheet whether or not the information is accurate. The validator(s) determines accuracy based on the federal definitions and source documentation requirements in the U.S. DOL issued *Data Validation Handbook*.

The procedures established by the Office of General Counsel for conducting data Validation are described below.

### II) SCHEDULING

- 1) Upon access to the Data Validation sample, the validator(s) assembles lists and identifies offices/locations with records to be validated.
- 2) The [validator\(s\)](#) will develop a schedule for notification, record request and processing exit records taking into consideration:
  - Number of Records in Sample Pool
  - Sites/Locations of Records
  - Staff Availability
  - Time Available between receipt of information and deadline

A Data Validation plan will be developed, work assignments made and a schedule drafted, guidelines, timeframes and staffing will be considered. A plan for site visits will be made; record review will be conducted at selected location(s) to be determined by the Office of General Counsel.

- 3) When the schedule is completed, whenever possible, the validator(s) will provide pre-notification to the [Regional Managers](#) five days prior to distribution of the actual participant record request. Correspondence will include the date the request will be made and the location(s) of the records based on data validation system information. The pre-notice will allow management planning time to insure availability of staff for collection of records and appropriate space for validation activities.

One or two days prior to arrival the participant record list is sent requesting current and complete files.

- 4) The Regional and Career Center Managers will receive the Data Validation sample list by email as early as possible on the scheduled date. A third party should be designated as responsible for the Data Validation project in the absence of availability of the normal onsite manager's contact.

Validation will be based on the files provided and only on the documentation they contain. (Staff participation in validation would result in some exceptions.) Participant records are examined at validator locations only. It is the responsibility of the administration, regional and local area manager to insure that all requested participant records are provided and contain complete information including case notes and management information printed forms within the timeframe established by Data Validation guidelines (1-2 days).

The Office of General Counsel reserves the right to centralize participant record review by region, local area or state when it has been determined that it is not feasible to perform an onsite review at all locations. As electronic participant records appear in the sample, examination will shift to NDOL administrative office.

### III) Onsite

- 1) Upon arrival the validator(s) attempt to notify either the site manager or their designee of arrival and request location of records. Entrance and exit interviews are not a part of Data Validation.
- 2) Career Center and/or Program Managers are responsible for determining that all files have been provided. Any records not received will be recorded as missing.

Sites with large verification lists (100+) may have records requested in increments with the total number cited in the initial notification. This allows files to be out of the staff access for a shorter period of time while taking up less space for the validation process. As each group nears completion the next group will be requested, maintaining the prescribed 1-2 day notification period.

- 4) The Validator(s) certify all of the data elements present on the worksheet, using the validation instructions in the U.S. DOL issued *Data Validation Handbook*. After reviewing the source documentation two possible validation outcomes are recorded:
  - Pass - The element was supported by/matched the source documentation.

- Fail - The source documentation showed that the data element was incorrect; no source documentation was available or record contained conflicting source documentation.

Materials supporting element validation are maintained only in participant records. Original records received by validator(s) will be left in the space provided for validation upon completion. Responsibility for maintaining original participant records remains with the local area (State WIA Record Retention Policy).

Staff may take part in the exit file review during validation if interested and approved by supervisor; final decisions will remain the responsibility of the validator(s). It is the responsibility of the manager (local or regional) to supply information on the availability and/or interest of staff at the time of validator(s) request. If notification is not made, time cannot be allowed for staff/managers to be included in the process.

References: WIA; TEGLS 03-03; 03-03, Change 1, Attachment A; 03-03 Change 3; 14-02, 17-05 and 31-09; TEN 14-02; TEN 9-06; WIA Validation Handbook.

#### **IV) Validation**

Until it is possible for more than one person to access the system at the same time, worksheets will be completed by hand. The choice of systems is determined for each Data Validation period and is based on past year experiences, availability of equipment, staff assistance and number of locations/records included in the sample.

##### **5) Paper Worksheets:**

- a) Worksheets are reviewed for clarity and organized by order in sample information.
- b) Wages: Source documentation for wage element validation will be conducted at the State level through a review of automated records and WRIS printed information. Following validation, Pass or Fail will be added to worksheets.

The system and personnel for wage record data validation will be identified through limited agreements with the Office of Unemployment Insurance. As some agreements will be short term to cover only the most current period of Data Validation, they will be developed during each project. Collection of wage information is conducted by additional staff supporting the validation project. Building Services staff has been identified, trained and authorized to complete this portion of data validation.

- c) Data Entry of paper worksheets into the DRVS system will be accomplished through use of staff temporarily assigned to the project.

- d) Review of data entry by sampling or total (dependent on sampling results) will be conducted by validator(s) or designated staff prior to notification that process is complete.
  - e) Worksheets will not be maintained at the state level as the information is available through the data validation management information system maintained by the Office of Employment and Training and space is limited.
- 6) Direct Entry: has not been an option to date due to problems maintaining data when more than one person accesses the program. The validator(s) wish to maintain this option, however, in the event a reliable system and technical support becomes available for validator(s) and wage verifiers.
- a) Pass or Fail information will be entered into the sample automated records.
  - b) Wages: Source documentation for wage element validation will be conducted at the State level through a review of automated records. Pass or fail will be entered into the electronic worksheets by wage verifier.
  - c) The system and personnel for wage record validation will be identified through limited agreements with the Office of Unemployment Insurance. As some agreements will be short term to cover the most current period of data Validation they may be developed separately for each year's data validation activity

## **V) Record Retention**

- 7) Completed worksheets, wage records and documents scanned will not be maintained in paper and/or electronic format.
- 8) Original documentation will be maintained in the local participant records and are the responsibility of the local area and service providers. These files must be maintained within the parameters of record retention requirements for all participant records or three (3) years following data validation, whichever is longer.

Records will be available during normal working hours to appropriate parties with 24 hours written notice.

Revised November 2010

## **2. ARRA Youth Programs**

**The following monitor plan and worksheets have been adapted from the WIA Youth and Summer Employment Component plans and worksheets used for review of those programs.**

**Monitor activities may be conducted using part, all or similar materials for final review documents.**

**Questions should be addressed to:**

**Sue DeMoss  
(402)471-9870  
[Sue.demoss@nebraska.gov](mailto:Sue.demoss@nebraska.gov)**

**Youth Program (ARRA), Summer Employment  
WIA Chapters Four and Five  
American Recovery & Reinvestment Act of 2009  
20 CFR 664; Federal Register Vol. 74, No. 52, Thursday/March 19, 2009  
TEGLs 13-08 & 14-08; TEN 30-08  
State Plan  
State Policy**

**Background:** ARAA funded Summer Employment opportunities are to occur between May 1 and September 30, designed to encourage participants to take responsibility for their learning, to understand and manage their career options and to develop social skills and a maturity level that will help them to interact positively with others. The projects may include classroom type age appropriate activities and must include work experiences which are planned, structured learning experiences that take place in a workplace for the limited period of time designed to enable youth to gain exposure to the working world and its requirements.

**Purpose:** To review local area programs and activities for compliance with the Acts, their implementing regulations and policies. Monitor activities will include onsite review activities.

**Documents:** Documents examined within the course of this review may include, although not necessarily be limited to the following:

- Local Area Plans
- Pre/Post Test Assessments
- Individual Service Strategy Form
- Participant Records
- Management Information Records
- Provider Contracts
- Fiscal Records
- Follow up services Records
- Worker's Compensation Coverage
- Management Information System Records
- 

**Interviews:** Interviews may include those conducted with administrative staff, program staff, worksites and participants.

**Question:** These questions will be addressed.

1. Does the local area have an ARRA funded Summer Employment Program?
2. Were services provider contracts awarded through the competitive procurement processes? (Excluding the grant recipient / fiscal agent and employers providing unsubsidized employment) or did the local area implement state emergency measures with a U.S. DOL waiver?
3. Does the local area program design to determine if the 12 month follow-up will be required for youth served with Recovery Act funds during the summer months only?
4. Does the local area provide clearly defined stipends for youth participants?
5. Does the program include classroom –based learning to complement the work experience?
6. Does the local area have an identified methodology for pre and post testing of work readiness skills?
7. What outreach and recruitment activities were taken to recruit youth to take part in the summer program?
8. Are ARAA activities in addition to those previously provided as part of the WIA Youth Program elements and participant projections?
9. How does the local area track expenditures and ensure that 30% of the funds expended are for Out of School Youth?
10. Does the local area have a system in place to determine and document eligibility?
11. Does the local area ensure that priority of service for Veterans and eligible spouses is afforded?
12. Does the local area have a system in place to match youth and oversee meaningful summer employment activities?
13. Does the local area provide supportive services as necessary and in accordance with their plan to enable youth to participate in authorized activities?

**Youth Program (ARRA) Work Experience Plan**  
**WIA 101, 129, American Recovery & Reinvestment Act of 2009**  
**20 CFR 664.460, 664.470**  
**Federal Register Vol. 74, No. 52, Thursday/March 19, 2009**  
**TEGLs 13-08 & 14-08; TEN 30-08**  
**State Plan**  
**State Policy**  
**American Recovery & Reinvestment Act of 2009**

**Background:** Youth Work Experiences are planned, structured learning experience in a workplace for a limited time. Work experiences are designed to enable youth to gain exposure to the working world and its requirements. The workplace may be a private for profit employer, non-profit employers or public employers. The time spent at the workplace may be paid or unpaid. The main purpose of the work experience is to provide a youth with opportunities for career experience and skills development. (Although the employer may benefit the employer from the youth's labor this is not the purpose of the Work Experience)

**Purpose:** To review local area programs and activities for compliance with the Acts, their implementing regulations and policies. Monitor activities will include onsite review activities

**Documentation:** The following documents may be examined as a part of the review.

- The Youth's assessment and employment plan or individual service strategy or employment plan.
- Management Information System Records
- Records of work experience duties and skills to be learned, work times and attendance, and other records relating to the work experience.
- Records including justification if a youth is receiving on-the- job-training and is less than 18 years of age.
- Financial records for youth that are receiving wages funded with youth funds.

**Interviews:** Interviews may be conducted with part or all of the following: administrative staff, program staff, worksites and participants

**Questions:** These questions will be addressed in the review:

1. Is there a written description of the work experience?
2. Does the description include information on wages, duties, attendance requirements, skills, attributes or knowledge the work experience is intended to provide?
3. Were the results of the objective assessments, interests, goals and the Individual Service Strategy of the youth considered in the decision to choose a certain work experience?
4. How does the youth participate in decision making concerning work experience?
5. How are the expenditures of funds for work experience wages tracked and documented?
6. How are records maintained and retained for the required time?
7. Are ARAA funded work experience activities in addition to the regularly planned WIA work experience activities?



**Youth Program (ARRA) Concurrent Enrollment  
WIA Sec. 126  
American Recovery & Reinvestment Act of 2009  
20 CFR 664  
State Plan  
State Policy**

**Purpose:** To review congruent enrollment systems to ensure compliance with law, regulation and policy.

**Documents:** The following documents will be examined as a part of the review.

- Local Area plans and policies
- Participant records
- Participant and fiscal records
- Management Information System

**Questions:** The following question will be addressed.

1. Does the Local Area ensure that concurrently enrolled participants are eligible for both programs?
2. Is the mix of services recorded in the participant's employment plan?
3. Does the local area ensure that program operators expend and track funds to ensure there is no duplication of expenditures?
4. Are records maintained for the required time?

## Youth Program Planning/Actual (ARRA)

This sheet is an information sheet to compare the Local Area's Budget Plan for expenditures the Local Area's expenditures as reported to the state.

A difference of more than ten % between the planned budget and the reported expenditures may indicate a need for additional monitoring or a revision of the Local Areas plans.

Expenditures			
Period	Planned	Reported	Difference
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

The Local Area's Planned Participation compared to reported participation.

Participants			
Period	Planned	Reported	Difference
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

### Expenditures

1. Is the difference between the budget and actual reported expenditures within 10% of the planned amount?
2. If the difference is more then 10% has the board submitted a revise plan? (Modification to the plan)
3. Are expenditures in addition to the WIA regular fund expenditures?
4. If the Board has not submitted a revised plan, describe what oversight has been completed and what action is being taken to assure the Local Area will meet its planned budget goals?

### Participant Numbers

1. Is the difference between the planned participant number and the actual reported participant number within 10% of the planned amount?
2. If the difference is more then 10% has the board submitted a revise plan? (Modification to the plan)
3. If the Board has not submitted a revised plan, describe what oversight has been completed and what action is being taken to assure the Local Area will meet its planned participant goals?

## Eligibility (ARRA )Summer Employment

Name:	
NWAS registration date:	
Application Date	
TREX Application Date	
Participation Date	
First Intensive Service Date	
School Status	Documented:
Age/DOB (14-24)	
Documentation Age/DOB	
Documented Selective Service Compliance	
Veteran Yes or No	
Documentation if Veteran Yes	Received Veterans Preference:
Low Income and One Barrier	
Low Income information/documentation	
Barriers (Document at least one)	
*Deficient in Basic literary Skills	
*School Drop Out	
*Homeless/Runaway	
*Foster Child	
*Pregnant or Parenting	
*Offender	
LOCAL Board Requires Additional Assistance:	
WIB (LA Designated Barrier)	No Current Designations
OR not low income Windowed AND - has at least one documented barrier	
*school drop out	
*BSD	
*One grade or more grade levels below the grade level appropriate to the individual's age	
*Pregnant or Parenting	
*Possess one or more disability including leering	
*Homeless or runaway	
*Local bard identified criteria for faces serious barriers to employment:	
Individual Services Strategy(may be abbreviated version for summer only participants )	
Signed/Date	
Work Readiness Assessment	Pre
Planned Post	
Activities other than Summer Employment	
*TREX activities match ISS (From printouts in file)	
<b>Start date of summer employment?</b>	
*Assessment of Supportive Service Needs	

Is Eligibility Documented Yes or No

Release of Information in file Yes or No

EOITL in the file Yes or No

Is participant Younger Youth (14-24) If Yes:

MIS Accuracy: (check if match participant record)

\*Age

\*Citizenship

\*Race

\*Sex

\*School Status

\*Grade Level Completed

\*Veteran

\*Labor Force (employed, employed but rec notice of term or military sep) or Not employed

## Entrance Interview (ARRA) Summer Youth:

Representing: \_\_\_\_\_

Date: \_\_\_\_\_

What services have been selected for the summer component?

(work experience, combination work experience and classroom support work, basic skills assessment resulting in a combination of work-based and classroom based learning activities to provide basic skills instruction, career exploration and life skills training)

Is the plan designed to encourage participants to take responsibility of their learning, to understand and manage their career options, and to develop social skills and a maturity level that will help them interact positively?

- for true at-risk students and high school dropouts.

How do services for younger youth differ?

3. Had the board previously determined to set aside funds for a regular WIA Summer Employment Component?

If yes, is the ARRA Summer Employment in addition to those funds?

5. What type of outreach/recruitment was done?

6. How are worksites chosen? (matched to participant's' interests and goals)(Green jobs)

7. How is the wage to participant determined?

8. Does the LWIA carry workers compensation coverage for summer employment-ø participants?

9. How are worksites and progress monitored? (Does oversight ensure that sites introduce and enforce the rigors, demands, rewards and sanctions associated with holding a job?)

10. What kind of orientation does the worksite receive?

11. What kind of agreement is completed with the site?

12. How were summer-employment (ARRA) providers selected?

- Contract
- RFP
- Youth Council Recommendation
- Waivers

13. Describe the Intake Process used for new participants entering only for the PY08-09 summer youth:

14. What methodology was selected to assess pre/post work readiness?

(Demonstrating measureable growth in: world of work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning, job search, life skills, positive work skills, develop motivation/adaptability, effective coping/problem-solving, acquiring an improved self image)

15. When will the participants show up in "Activity on TREX"?

16. How many participants are being served in the "summer component"?

- # ARRA Summer Employment
- # WIA Summer Employment

17. Will youth designated as “summer employment only” be carried into the year round program if workers deem appropriate?

**DOCUMENTATION TO BE SUPPLIED:**

- Board meeting record of provider selection
- Record of Youth Council Recommendations
- RFP
- Contract
- Waiver
- Worksite Agreement
- Orientation Materials
- Assessments
- Written Policies or Instructions

### Youth Work Experience (ARRA)

Name	Active in TREX for Pay Period	Worksite Agreement		Timesheet Hours:	Signed	Timesheets	Payroll printout	Comments
		Y	N			Pay Period To _____ _____ _____	Pay Period To _____ _____ _____	

Compared to payroll printout source:

---

## Worksite Interview (Youth ARRA)

<b>YOUTH:</b>	<b>WORKSITE:</b>
<b>WORK HOURS:</b>	<b>SIGNING PARTY:</b>
<b>INTERVIEWED YOUTH</b>	<b>SUPERVISOR INTERVIEWED</b>
<b>DID YOU RECEIVE AN ORIENTATION?</b>	<b>DID YOU RECEIVE AN ORIENTATION? (DID IT INCLUDE CHILD SAFETY LAWS)</b>
<b>WHAT DO YOU DO HERE? (DOES IT MATCH THEIR INTEREST AND GOALS, EQUIPMENT?)</b>	<b>HOW MANY HOURS DOES THE YOUTH WORK?</b>
<b>WHAT HAVE YOU LEARNED</b>	<b>WHAT DUTIES DOES THE YOUTH PERFORM? (WHAT EQUIPMENT DO THEY OPERATE, IF ANY)</b>
<b>WHO IS YOUR SUPERVISOR?</b>	<b>WHO SIGNS OFF ON THE TIMESHEETS AND COMPLETES EVALUATIONS?</b>
<b>DO YOU KNOW WHO TO CALL IF YOU HAVE ANY PROBLEMS?</b>	<b>DO YOU KNOW WHO TO CALL IF YOU HAVE ANY PROBLEMS?</b>
<b>HOW DO YOU TURN IN YOUR TIME?</b>	<b>HOW DO YOU TURN IN THE TIME?</b>
<b>HAVE YOU BEEN PAID?</b> <b>IF NO, WHEN WILL YOU BE PAID?</b> <b>IF YES, HOW WAS THE PAYMENT RECEIVED?</b>	<b>DO YOU KNOW WHAT THE GOALS ARE FOR THE YOUTH TO ACHIEVE? (EXPERIENCE/TRAINING REQUIRED TO MEET WORK READINESS GOALS)</b>
<b>HAVE THERE BEEN ANY PROBLEMS? IF YES, HOW WERE THEY RESOLVED?</b>	<b>HAVE THERE BEEN ANY PROBLEMS? IF YES, HOW WERE THEY RESOLVED?</b>
<b>HAVE YOU HAD AN ONSITE VISIT BY PROGRAM STAFF?</b>	<b>HAVE YOU HAD AN ONSITE VISIT BY PROGRAM STAFF?</b>

(Worksites: committed to helping participants meet work readiness goals for summer participants, supervisors work closely with staff, flexible in working with youth who have issues. Workplace safety guidelines resources: <http://www.youthrules.dol.gov/about.htm> and <http://www.osha.gov/teens>



<u>Allowable</u>		<u>Participant Name</u>	<u>Vendor</u>	<u>Reason</u>	<u>Service Provided</u>	<u>Documentation</u>	<u>Authorized By</u>
<u>Yes</u>	<u>No</u>						
		30.					
		31.					
		32.					
		33.					
		34.					
		35.					
		36.					
		37.					
		38.					
		39.					
		40.					
		41.					
		42.					
		43.					
		44.					
		45.					
		46.					
		47.					
		48.					
		49.					
		50.					
		51.					
		52.					
		53.					
		54.					
		55.					
		56.					
		57.					
		58.					

**Supportive Service Worksheet Adult/Dislocated Worker**

- Was supportive service necessary for participation?
- Was it shown that services were not available elsewhere?
- Was service reasonable and necessary?
- Was service with board policy/limitations?

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

### **Youth Program (ARRA) Work Experience Plan and Worksheet**

1. Describe the process the Local Area uses to provide and objective Assessment.
2. Describe the process of developing an Individual Service Strategy?  
(Include information on the participation of the youth in developing the Individual Service Strategy)
3. Does the Local Area have any youth (under 18) participating in on the job training? If so, has the Local Area provided a justification?
4. Chose a suitable sample individuals participating in Work Experience.

<b>Name</b>	<b>Eligible (Younger Older Concurrent)</b>	<b>ARRA funded Summer Employment</b>	<b>Objective Assessment</b>	<b>Individual Service Strategy</b>	<b>Work Experience</b>

**Youth Program, (ARRA) Concurrent Enrollment  
Concurrent Enrollment Worksheet**

Select a suitable sample of congruent participants. Record

<b>Name</b>	<b>Concurrent and Eligible in all Programs</b>	<b>Employment Plan</b>	<b>Fiscal Tracking</b>