

# MEMORANDUM

## IDAHO DEPARTMENT OF LABOR



WIAB 02-03

**DATE:** September 11, 2003

**TO:** Local Workforce Investment Areas

**FROM:** Cheryl Brush, Chief, Workforce Systems

**SUBJECT:** Second Quarter Monitoring: The On-Site Review

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As referenced in WIA Bulletin (WIAB) #01-02, during the second quarter of each program year, the Grants Management Unit reviews Subrecipients on-site for compliance with the Act, regulations, rules, policies, local plans and contracts. Your grants officer will be contacting you to coordinate dates and times for this review soon.

For your information, the On-Site Review tool has been attached to this memorandum.

Attachments

## WIA SERVICE PROVIDER REVIEW

Program Year: \_\_\_\_\_

### On-site Review

Provider Name:	Cost Center Number:
WIA Agreement Number:	Reviewer _____
Date(s) of Review:	Name(s): _____

### PRIOR REVIEW

Describe any related findings or improvements identified during the most recent Participant File review and/or Financial/Reports/Misc Review that require attention during this On-Site review.

Review Date \_\_\_\_\_

Review Codes: 1: Finding    2: Needs Improvement    3: None    4: Exemplary

### STATEMENT OF WORK

Review the Statement of Work with the Provider. Are they meeting contract objectives and do their processes follow contract requirements?

1.  Finding     Needs Improvement     None     Exemplary

Describe participant intake and eligibility process; include actual steps taken by participant and case manager to accomplish pre-assessment and verify program eligibility.

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2.  Finding  Needs Improvement  None  Exemplary

Describe participant selection process. *Reviewer Note: The objective here is to determine whether the providers' participant selection process follows federal/state standards and that the process is fair and equitable. In regions utilizing a priority point system, the Provider should demonstrate the means of assessment and selection using this system. In those regions that do not utilize a priority point system, some other demonstrable means of selection must be in place.*

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3.  Finding  Needs Improvement  None  Exemplary

Does the Provider provide information to each applicant and participant on the full array of services available in the area? *Reviewer Note: All services do not need to be provided by the Provider being reviewed; each WIB should have developed procedures and materials on the full array of services available in the area; applicants and enrollees should have access to service listings or materials for the entire region.*

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4.  Finding  Needs Improvement  None  Exemplary

Is there any evidence of violation of the nepotism standards? *Reviewer Note: In addition to the prohibition against a site hiring a relative into a training position, the Provider may not hire a person in any position funded under WIA if a member of that person's immediate family is engaged in any administrative or support function in the hiring and/or funding organization.*

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5.  Finding  Needs Improvement  None  Exemplary

Describe the Provider's continuous Improvement process and how it contributes toward meeting performance measures and fulfilling goals identified on the Agreement's program planning summary.

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6.  Finding  Needs Improvement  None  Exemplary

Describe special youth requirements, include the minimum youth expenditure rate and provision of the 10 required elements.

1. *tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies;*
2. *alternative secondary school services, as appropriate;*
3. *summer employment opportunities that are directly linked to academic and occupational learning;*
4. *as appropriate, paid and unpaid work experiences, including internships and job shadowing;*
5. *occupational skill training, as appropriate;*
6. *leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate;*
7. *supportive services;*
8. *adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;*
9. *follow-up services for not less than 12 months after the completion of participation, as appropriate; and*
10. *comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.*

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7.  Finding  Needs Improvement  None  Exemplary

Describe the participant exit and follow up process. In addition to client services, include a description of the technical steps necessary for MIS data entry and document submission.

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**SUPPLEMENTAL REPORTING**

8.  Finding  Needs Improvement  None  Exemplary

The outcome data for WIA performance measures is based on Unemployment Insurance wage records and supplemental reporting. If the project has conducted supplemental reporting to document outcomes, this documentation must be maintained at the provider level. Does the project maintain a supplemental documentation file that includes the required documentation?

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## COMPLAINTS/RECORDS RETENTION

9.  Finding  Needs Improvement  None  Exemplary

Does the Provider maintain a log of complaints filed, including those that allege discrimination?  
*Reviewer Note: this can be a complaint log where complaints of discrimination would be filed; it must be kept confidential to the extent practical (to allow investigations).*

10.  Finding  Needs Improvement  None  Exemplary

Has the Provider properly retained prior year agreement records and files? *Reviewer Note: WIA requires that records be maintained for a period of not less than three years from the date of final grant payment; these records need not be retained on premises.*

## PROPERTY/EQUIPMENT

11.  Finding  Needs Improvement  None  Exemplary

Does the provider possess WIA purchased or leased equipment? If so, describe the procedures in place to ensure that it is safeguarded, properly identified and that it is used for authorized purposes?  
*Reviewer note: the Inventory List will be required to make this determination.*

12.  Finding  Needs Improvement  None  Exemplary

Are WIA funded equipment purchases of \$2,000 or more included in the budget, with a current inventory listing maintained for these items, along with a WIA attached property tag? Has the State Administrative Entity received and granted a request for purchase of such equipment?

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**FINANCIAL MANAGEMENT/PROCUREMENT**

The reviewer will need access to the Provider's financial records and a copy of the local IWB procurement policy for accurate review of this section

13.  Finding  Needs Improvement  None  Exemplary

Does the Provider's accounting system provide for a comparison of actual Subgrant expenditures with budgeted amounts? *Reviewer note: this question is not applicable to Job Service Agreements.*

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14.  Finding  Needs Improvement  None  Exemplary

Does the Provider accounting system provide for a level of detail that allows identification of costs and chargeability to the WIA program? *Reviewer note: Vouchers, receipts, timesheets and all other payments must be identifiable as WIA costs; track a voucher/payment and timesheet to confirm answer. This question is not applicable to Job Service Agreements.*

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15.  Finding  Needs Improvement  None  Exemplary

Has the Provider requested or received reimbursement for expenditures not authorized by the Subgrant Agreement? *Reviewer Note: This review should compare line item Subgrant amounts and expenditure types with the accounting records to determine if the Provider is adhering to the intent of the agreement*

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16.  Finding  Needs Improvement  None  Exemplary

Does the Provider either direct charge all costs or use a clear and viable cost allocation system? *Reviewer Note: This question is not applicable to Job Service Agreements*

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17.  Finding  Needs Improvement  None  Exemplary

Are program costs considered reasonable, necessary, allowable, and allocable? *Reviewer Note: To be reasonable, the costs must be at levels no greater than fair market value for the good or service; to be necessary, there must be a clear connection between the WIA costs and successful operation of Subgrant activities; to be allowable, costs must not be listed as unallowable by OMB circulars or the General Provisions and Assurances; to be allocable, the costs must clearly be attributable to the WIA program.*

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18.  Finding  Needs Improvement  None  Exemplary

Does the Provider exercise proper control of WIA funds, such as the safeguarding of blank checks and/or supportive service orders?

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19.  Finding  Needs Improvement  None  Exemplary

If the Provider utilizes motor vehicles in carrying out agreement activities, is the minimum required coverage in effect? *Reviewer Note: Minimum required coverage is \$500,000 combined single limits per occurrence*

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20.  Finding  Needs Improvement  None  Exemplary

Were any sole source purchases made? Is justification for this purchase method maintained in Provider files in accordance with local policy? *Reviewer note: A sole source item is an item with only a single supplier. Many times agencies send requests for sole source purchases that describe an item made only by one manufacturer, however the item is distributed and readily available from many different suppliers. As long as there is more than one potential bidder or offer for the property item then there is no justification for a sole source determination.*

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**UNION/POLITICAL/RELIGIOUS ACTIVITIES**

21.  Finding  Needs Improvement  None  Exemplary

Based on a financial records review and on-site interviews/observations, is there any evidence to suggest:

- WIA funds have been used by the Provider to support or deter union activities or
- Participants or WIA funded staff have engaged in political activity while be paid with WIA funds, or
- WIA funds have been used in support of any religious or anti-religious activities?

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## EQUAL OPPORTUNITY/NONDISCRIMINATION

22.  Finding  Needs Improvement  None  Exemplary

Is EO and nondiscrimination information provided according to State and Federal requirements?:

- Has the notice, "Equal Opportunity Is the Law," been posted in conspicuous locations where applicants/registrants, participants, eligible applicants/registrants and employees can easily view it?
- If a significant number of persons in the population base have limited English proficiency, is the notice posted in the appropriate language?
- Do recruitment materials including written, electronic (websites or PowerPoint presentations), and broadcast media distributed to the public contain the following:
  - Equal Opportunity Employer/Program
  - Auxiliary Aids and Services Available Upon Request to Individuals With Disabilities
  - TDD/TTY Through Idaho Relay Service 1-800-337-3529

*Reviewer note: this information is available online in the MIS as WIAP 1-00, page 15*

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23.  Finding  Needs Improvement  None  Exemplary

Are efforts being made to serve people as reflected in population groups? *Reviewer note: look at target of materials distributed to the public and outreach plans if they have them (not required).*

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### **Compliance with 504 of Rehabilitation Act of 1973**

24.  Finding  Needs Improvement  None  Exemplary

How is programmatic accessibility and physical accommodation provided? *Reviewer note: If serving disabled, are services provided in the most integrated setting—i.e., reasonable accommodation—reasonable modification; is communication as effective as with others—i.e., auxiliary aids, signage, TTY/TTD; outreach; does the physical location appear to be architecturally accessible? The physical accommodation is not applicable to Job Service Agreements*

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