Department of
Labor & Workforce
Development

# MONITORING GUIDE 2019

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# Monitoring Guide 2019

## I. Introduction

Monitoring and technical assistance are integral parts of the Tennessee Department of Labor and Workforce Development's (TDLWD) oversight responsibilities, as required by law. Monitoring is an essential part of program and financial management to ensure compliance with applicable laws, regulations, integrated workforce plans, provider agreements, policies, and procedures. Monitoring identifies areas of strength and weakness in operations with the intent of developing program performance. Technical assistance improves program operation and management capabilities.

TDLWD's approach to program and fiscal monitoring of each Local Workforce Development Area (LWDA) uses a combination of on-site monitoring and desktop monitoring, as prescribed in Workforce Innovation and Opportunity Act (WIOA) Section 183. Special on-site reviews may be conducted to investigate allegations of mismanagement or to clarify questionable findings during monitoring. Special reviews may or may not result in corrective action.

The State must conduct an annual on-site monitoring review of each LWDA's fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). Specific information will be requested from the local area which will be reviewed virtually prior to the on-site review. The TDLWD has established a more strategic method for programmatic and performance monitoring — through the implementation of a Virtual Case Management System (Jobs4TN) — which allows for virtual (desktop) monitoring of participant files and the upload of supporting documentation, including policies and program notes. On-site monitoring will still be conducted at a minimum of once per program year. Monitoring may also occur at the discretion of TDLWD and as need is indicated by Local Workforce Development Boards (LWDBs). This flexibility allows for collaboration between the TDLWD and the LWDBs.

## II. Process/Methodology

Oversight and monitoring will focus on local areas' systems to ensure that acceptable standards for fiscal accountability, program administration, procurement, and integrated service delivery are established and in practice. In addition to the annual monitoring and required formal monitoring reviews, oversight and programmatic reviews will be conducted year-round via program management and compliance staff to ensure compliance with applicable administrative requirements — specifically identification of system strengths, weaknesses, and required corrective actions.

## 1. Requirements of Local Workforce Development Boards to Monitor One-Stop Operators, Fiscal Agents, Subcontractors, and All Local WIOA-Funded Contracts

WIOA Section 185(c) provides that:

*(c) GRANTEE INFORMATION RESPONSIBILITIES.—Each State, each local board, and each recipient (other than a subrecipient, subgrantee, or contractor of a recipient) receiving funds under this title—*

> *(1) shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary;*
>
> *(2) shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188;*
>
> *(3) shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title; and*
>
> *(4) shall, to the extent practicable, submit or make available (including through electronic means) any reports, records, plans, or any other data that are required to be submitted or made available, respectively, under this title.*

**Program Oversight**: As outlined in WIOA Section 107(d)(8), LWDBs are required to conduct monitoring and oversight of their subrecipients. In order to ensure LWDBs are properly conducting oversight of WIOA funds, TDLWD requires LWDBs to establish and execute tools and guides to outline how monitoring activities will be conducted. In addition to conducting monitoring and oversight as the grantee, TDLWD will also monitor LWDBs to review their monitoring activities.

Pursuant to WIOA Section 107(d)(8), the LWDB (in partnership with the Chief Local Elected Official [CLEO] for the Local Workforce Development Area [LWDA]) must:

- Conduct oversight for local youth workforce investment activities, local employment and training activities for adults and dislocated workers, and the One-Stop Delivery System in the local area;
- Ensure the appropriate use and management of funds provided for these activities; and
- For workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcomes under WIOA Section 116.

**LWDB Monitoring Plan Requirement:**

Each LWDB shall prepare and submit — to the TDLWD's Workforce Services Division — a schedule and a policy addressing how they will conduct monitoring of their subrecipients, pursuant to 2 CFR 200.331.

## 2. Local Workforce Development Boards and Fiscal Agents

Each subrecipient of funds under WIOA Title I must conduct regular oversight and monitoring of its WIOA programs and contractors in order to:

- Determine that expenditures have been made against the proper cost categories and within the cost limitations, specified within WIOA and the regulations in this part;
- Determine whether there is programmatic compliance with WIOA, including additional applicable laws and regulations;

- Assure compliance with 2 CFR 200 (e.g. 2 CFR 200.34, Expenditures; 2 CFR 200.84, Questioned Cost; and 2 CFR 200.85, Real Property); and
- Determine compliance with the nondiscrimination, disability, and equal employment opportunity requirements of WIOA Section 188.

"Subaward" means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

"Contractor" means an entity that receives a legal instrument (i.e. contract) by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward (2 CFR 200.22). The responsibilities of a contractor are to:

- Ensure monitoring of service providers on an annual basis and at least sixty (60) business days prior to the expiration of the service provider or subrecipients' contract with its subcontractors. This requirement includes the submission of monitoring reports and resolutions to the TDLWD Compliance and Policy Unit (workforce.board@tn.gov).
- Provide all requested documents to the TDLWD Program Accountability Review Unit (PAR Unit) within thirty (30) business days prior to the scheduled monitoring date.
- Have documents available which were previously identified by the TDLWD as required for the on-site review. Documents must be presented in an organized manner in order to facilitate expedient examination by monitors.
- Ensure appropriate staff is available at the on-site location, and on all monitoring date(s), to assist TDLWD monitors.

## 3. Required Local Workforce Development Board Policies and Procedures

As a part of their oversight or monitoring role, each LWDB and fiscal agent shall develop written policies and procedures to monitor WIOA-funded programs and the delivery of integrated services. LWDBs must ensure compliance at the federal, state, and local levels concerning administrative and financial requirements, policies, and procedures in order to ensure performance goals are being achieved. Policies must be approved by the LWDB. Each LWDB should have a process to review, implement, and update policies. Policies and guidance approved by the State Workforce Development Board (SWDB) can be found through the following link:

https://www.tn.gov/workforce/general-resources/program-management/program-management-redirect/workforce-services-redirect/wioa-technical-assistance.html

These specific monitoring policies and procedures may be consolidated into one comprehensive document. However, monitoring policies may also be separated into two documents which distinctly and separately address LWDB and financial compliance requirements. Written policies and procedures shall describe:

**a.** The roles and functions of LWDBs, LWDB staff, and fiscal agents in their oversight or monitoring processes;
**b.** Who, by title, shall be responsible for the monitoring of each program activity;
**c.** The types of reports which shall be prepared as a result of such monitoring;
**d.** To whom reports will be distributed;
**e.** The scope and frequency of monitoring efforts for each program activity consisting of:
  **i.** Monitoring activities by using uniform monitoring tools, desk reviews, on-site visits, and telephone contacts resulting in a summarized written report;
  **ii.** Conducting on-site reviews of policies, plans, and procedures governing all segments of their program activities and program operations (reviews must be conducted at least once during the program year);
  **iii.** Conducting pre-award financial review or on-site post-award monitoring of recipients, who have little or no workforce program experience, no later than one hundred twenty (120) business days after the award of a contract;
  **iv.** Monitoring program accountability of each subrecipient providing service to participants to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. **Note:** LWDBs must monitor each subrecipient once annually and no less than sixty (60) business days prior to the expiration date of the contract; and
  **v.** Reviewing a sample of participants' files to determine compliance with required laws, policies, plans, and procedures at the federal, state, and local levels.
**f.** The methods which shall be used to monitor program activities;
**g.** The methods which shall be used for procurement and financial monitoring:
  a. General procurement standards are outlined in 2 CFR 200.318:

     *The non-Federal entity must use its own documented 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. Procurement standards used by the TDLWD are contained in the Grant Management and Subrecipient Monitoring Policy (Policy Number 2013-007), published by the Central Procurement Office. This policy can be accessed through the following link:

     https://www.tn.gov/content/dam/tn/generalservices/documents/cpo/procurement-commission-meetings/pc-meeting-12-14-17/cpo-and-library-page/Policy2013-007_Grant_Management__updated12.14.17.docx;

**h.** Who, by title, shall be responsible for ensuring corrective actions are taken when problems are found;
**i.** The time-frame, in terms of days or weeks, for completion of corrective actions;
**j.** Guidelines for follow-through monitoring, when necessary, to determine if corrective action has been completed; and
**k.** An appeal process for disagreements.

# III. Providing Notice of Equal Employment Opportunity and Nondiscrimination

## 1. General Prohibitions on Discrimination

*"No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries, applicants, and participants only, citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I financially assisted program or activity". (29 CFR 38.5)*

## 2. Providing Initial and Continuing Notice

**a.** All recipients of financial assistance under WIOA (excluding the beneficiaries of WIOA programs or activities) must provide initial and continuous notice that they do not discriminate on any prohibited basis.

**b.** For the purpose of equal employment opportunity and nondiscrimination regulations, recipients include but are not limited to:

- **i.** State-level agencies that administer WIOA Title I funds, whether financed in whole or in part by WIOA;
- **ii.** State Workforce Agencies;
- **iii.** State and Local Workforce Development Boards;
- **iv.** Local grant recipients;
- **v.** One-Stop Operators;
- **vi.** Service providers, including eligible training providers;
- **vii.** On-the-Job Training (OJT) employers;
- **viii.** Job Corps contractors and center operators;
- **ix.** Job Corps national training contractors;
- **x.** Outreach and admissions agencies, including Job Corps contractors that perform these functions;
- **xi.** Placement agencies, including Job Corps contractors that perform these functions; and
- **xii.** Other National Program recipients.

**c.** This non-discrimination notice must be provided to:

- **i.** Registrants, applicants, and eligible applicants/registrants;
- **ii.** Participants;
- **iii.** Applicants for employment and employees;
- **iv.** Unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
- **v.** Subrecipients that receive WIOA Title I financial assistance from the recipient; and
- **vi.** Members of the public, including those with impaired vision or hearing and those with limited English proficiency.

*Recipients must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. (29 CFR 38.34, 29 CFR 38.4, 29 CFR 38.15)*

**d.** The Equal Opportunity is the Law poster — which is available in English, Arabic, Chinese, and Spanish — must be posted prominently, in a reasonable numbers of places, in available and conspicuous physical locations and on the recipient's website.

**e.** The international symbol for accessibility should be shown directing individuals to an accessible entrance and the telephone number to call if an accommodation is needed to receive services. Information concerning these regulations can be found in the Methods of Administration, specifically Element V.

**f.** If the customer needs language assistance, and is unable to identify the language in which they need assistance, the Avanza Language Line can help to identify the language the customer is speaking. (29 CFR 38.35, 29 CFR 38.36)

**g.** The following should be observed concerning the Equal Employment Opportunity is the Law Signature Form:

- **i.** All individuals registered in WIOA should read, understand, and sign the complaint procedure signature form. A signed copy must be given to the individual and an additional signed copy must be placed in the individual's file.
- **ii.** LWDBs are required to provide the complaint procedure signature form to all current employees (regardless of whether the positions are partially or fully-funded by WIOA) and ensure that all new employees receive this form when they begin employment (again, regardless of whether the positions are partially or fully-funded by WIOA). All employees should read, understand, and sign the complaint procedure form which should then be placed in their personnel file.
- **iii.** Applicants for WIOA services or applicants for employment with the recipient have access to the appropriately displayed equal employment opportunity and nondiscrimination posters and information.
- **iv.** The complaint signature forms are printed in English. LWDBs should use Avanza Services to translate the form for use by service providers located in an area that has a substantial number of participants who require notification in other languages.
- **v.** Orientation presentations to new participants, new employees, and/or the general public regarding WIOA financially-funded programs must include a discussion of rights under the nondiscrimination and equal employment opportunity provisions of WIOA.

### 3. Publications, Broadcasts, and Other Communications

Recipients must indicate that the WIOA Title I financially-assisted program or activity in question is an "equal opportunity employer/program" and that "auxiliary aids and services are available upon request to individuals with disabilities". This indication must be included in recruitment brochures and other materials that are ordinarily distributed or communicated — whether in written, oral, electronic, and/or paper format — to staff, clients, or the public at large to describe programs financially assisted under Title I of WIOA, including the requirements for participation. Where such materials indicate that the recipient may be reached by voice telephone, the materials must also prominently provide the telephone number of the text telephone (TTY) or equally effective telecommunications system — such as a relay service — used by the recipient.

*"Recipients that publish or broadcast program information in the news media must ensure that such publications and broadcasts state that the WIOA Title I-financially assisted program or activity in question is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I-financially assisted program or activity is prohibited by Federal*

*law), and indicate that auxiliary aids and services are available upon request to individuals with disabilities." (29 CFR 38.38[b])*

# IV. Administrative Procedures

## 1. Overall Responsibilities

Program and financial monitoring is performed through desktop reviews and on-site visits. During and in advance of these visits, TDLWD will request a sample of documentation to monitor activities and programs.

The TDLWD will utilize their respective WIOA Monitoring Tools — which will be distributed during the month of October, at the beginning of business year 2018 as this follow full WIOA implementation — to serve as the foundation for oversight/monitoring activities. Furthermore, the State must conduct an annual on-site monitoring review of each local area's fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). TDLWD will prepare and distribute these monitoring instruments for information and self-assessment purposes.

The Compliance and Policy, Fiscal, and PAR Units will review locally-provided supportive documentation to determine compliance with all applicable regulations and standards. Monitoring and reviews will take place throughout the year. For on-site monitoring, the PAR Unit will provide instructions — by separate correspondence — on required documents to be submitted to the PAR Unit, within thirty (30) business days prior to scheduled on-site monitoring visits; the PAR Unit will also supply a list of documents which must be available to monitors prior to the on-site review.

The PAR Unit will identify a Comprehensive One-Stop Center in the workforce development area where the on-site system monitoring will be conducted, and will issue monitoring reminders to the LWDB staff prior to scheduled on-site monitoring visits. Specific areas of emphasis, which are contained within the TDLWD's WIOA Monitoring Tool, include but are not limited to:

**a.** System Administration and Effectiveness of Monitoring:
- **i.** LWDB governance, bylaws, composition, minutes, re-certification, oversight and monitoring responsibilities;
- **ii.** Local agreements and contracts; and
- **iii.** Memorandums of Understanding (MOUs).

**b.** Fiscal Compliance Oversight and Monitoring:
- **i.** Fiscal agent operational policies and procedures;
- **ii.** Accounting system, entries, and documentation;
- **iii.** Procurement methods and documentation;
- **iv.** Contracts verification (i.e. purchase, rent, leases);
- **v.** Internal controls; and
- **vi.** Personnel and payroll records.

**c.** Program Administration and Effectiveness Monitoring:
- **i.** Integrated delivery of Adult and Dislocated Worker services and Youth services funded by WIOA; and
- **ii.** National Emergency Grants.

### 2. Scheduling

The PAR Unit will prepare and distribute annual monitoring schedules near the beginning of each program year. The TDLWD's WIOA Monitoring Tools will also be provided for information and self-assessment purposes. Each program year, TDLWD staff shall publish the annual monitoring schedule to include the date and time of the on-site monitoring visit and desktop monitoring for each area. This schedule is subject to change to accommodate requests from local areas as well as address unanticipated situations affecting State staff.

### 3. Entrance and Exit Monitoring

Prior to the start of each on-site monitoring review the PAR Unit — which may also include the Compliance and Policy Unit, Fiscal Unit, and Program Staff as needed — will hold an entrance conference call with the LWDB staff, fiscal agent, and other interested parties to establish the purpose, parameters, and time-frame of the visit. During this call, any relevant information will be discussed which may enhance the effectiveness of the review. All previously requested documents must be available for review and distribution, including items to be retained by the monitoring team.

An exit conference call will be conducted after each TDLWD monitoring review. The exit conference call will be provided to the LWDB and CLEO to identify issues that may result in noncompliance and/or questioned costs. Additional findings and/or questioned costs may arise after the on-site review and exit conference call are concluded.

## V. State Monitoring Process/Action Steps

### 1. Time Schedules

The PAR Unit and Workforce Services Division will jointly establish monitoring schedules.

### 2. Notification Process

The PAR Unit will provide written notice to each entity being monitored at least thirty (30) business days prior to a review being conducted. The written notice will inform the entity of: the dates for the review, which programs will be reviewed, the contract number of each contract that will be examined, and the estimated time of arrival.

If the date identified in the written notification is not convenient for the entity being monitored then the entity must contact the monitors immediately. The entity and the monitors will determine a mutually-satisfactory date and the review will be rescheduled. However, State monitors and TDLWD executive management reserve the right to conduct unscheduled or monitoring reviews as appropriate.

### 3. Monitoring Process

The PAR Unit, in conjunction with the Compliance and Policy Unit, will use the annually-updated monitoring guide to conduct fiscal system and program activity reviews. The guide will be amended as regulatory changes occur.

- The monitoring review may be conducted through desktop evaluation, on-site evaluation, or through a combination of these two processes.
- PAR Unit monitors are authorized to monitor any entity receiving WIOA funds at the Comprehensive and Affiliate American Job Centers, including any contracts/entities utilizing WIOA funds through LWDBs. Their review may include, but is not limited to:

examining program records, questioning employees, interviewing participants, and entering any site or premises which receive WIOA funds.

- Random sampling techniques will be used to perform the review of program records. Monitors will hold an exit conference with appropriate officials for each review conducted.
- After the monitors finish their examination, working papers shall be established during the review and maintained by the TDLWD.

### 4. Monitoring Report

The PAR Unit will issue the monitoring report within thirty (30) business days from the conclusion of the monitoring review.

### 5. Corrective Action

The monitored entity will submit a corrective action plan within thirty (30) business days subsequent to PAR releasing a monitoring report that requires corrective action. Corrective action must be provided within thirty (30) business days of the receipt of the monitoring report from the PAR Unit.

### 6. Progress Report

If the initial corrective action provided to TDLWD is not accepted then the entity will submit a progress report each month until the corrective action has been accomplished.

## VI. Program Descriptions

### 1. Wagner Peyser

Wagner-Peyser Act-funded workforce preparation services are an integrated component of the nation's American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name) system. They are coordinated with other adult programs under the Workforce Innovation and Opportunity Act (WIOA) to ensure that job seekers, workers, and employers have convenient and comprehensive access to a full continuum of workforce related services. The most distinguishing feature of the Wagner-Peyser Employment Service is that it is the only "universally accessible" public workforce program.

Wagner-Peyser-funded services support the development of a competitive workforce for today's global economy. Under the Wagner-Peyser Act, unemployed individuals and other job seekers obtain critical job search, assessment, and career guidance services to support them in obtaining and retaining employment. In addition, Wagner-Peyser-funded activities assist employers with building skilled, competitive workforces through recruitment assistance, employment referrals, and other workforce solutions. Activities funded under the Wagner-Peyser Act also include the development and dissemination of regional workforce information and related resources, which provide both job seekers and employers with comprehensive and accessible economic and industry data to inform workforce and economic development activities.

### 2. Senior Community Service Employment Program

The purpose of the Senior Community Service Employment Program (SCSEP) program is to provide, foster, and promote useful part-time work opportunities (usually 20 hours per week) in community service employment activities for unemployed low-income persons who

are 55 years of age and older. To the extent feasible, SCSEP assists and promotes the transition of program participants into unsubsidized employment.

### 3. Trade Adjustment Assistance

The purpose of the Trade Adjustment Assistance (TAA) program is to provide assistance to workers adversely affected by foreign trade. Services are provided under the TAA program to enable workers to return as quickly as possible to work that will use the highest skill levels and pay the highest wages, given the workers' preexisting skill and educational levels, as well as the condition of the labor market.

The Trade Act of 1974 has been amended multiple times-most recently by the Trade Adjustment Assistance Reform Act of 2002 (Pub. L. No. 107-210) (TMRA or Trade Act of 2002); the Trade and Globalization Adjustment Assistance Act of 2009 (TGMA or Trade Act of 2009) (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5); the Trade Adjustment Assistance Extension Act of 2011 (TAAEA or Trade Act of 2011) (Title II of Pub. L. No. 112-40); and the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015 or Trade Act of 2015) (Title IV of the Trade Preferences Extension Act of 2015, Pub. L. No. 114-27). ]

Compared to the Trade Act of 2002, the Trade Act of 2011 expanded eligibility of the TAA program and replaced Alternative Trade Adjustment Assistance (ATAA) with Reemployment Trade Adjustment Assistance (RTAA) - but at the 2002 benefit levels. The TGAAA extended the TAA program through December 31, 2010, and the Omnibus Trade Act of 2010 further extended TAA through February 15, 2011. After that date, the TGAAA amendments to the Trade Act expired, and the TGAAA required the TAA program to operate under the TAARA provisions, through October 21, 2011. On this date, the TAAEA was passed, which reauthorized many of the provisions under the Trade Act of 2009, but with slight modifications. The TAAEA amendments to the Trade Act expired on December 31, 2013, and the TAAEA required the TAA program to operate under the provisions of the Trade Act of 2002, with three provisions of the Trade Act of 2011 remaining (referred to as Reversion 2014). The TAARA 2015 both amends and reauthorizes the TAA Program. The TAARA 2015 restores the worker group eligibility and benefits established by TAAEA.

The TAARA 2015 also (1) authorizes the operation of the 2015 Program and continuation of the 2002 Program, the 2009 Program, and the 2011 Program through June 30, 2021; (2) provides a 90-day transition period for Reversion 2014 Program participants to transition to the 2015 Program; (3) expands coverage of certifications of petitions filed since January 1, 2014 for 90 days; (4) requires reconsideration of negative determinations of petitions filed since that date and before the date of enactment under 2015 Act certification requirements; and (5) reauthorizes the Health Coverage Tax Credit (HCTC) program benefit for eligible TAA participants. TAARA 2015 also added new requirements to align performance reporting for the TAA Program with the requirements of the Workforce Innovation and Opportunity Act (WIOA).

### 4. WIOA Title I (Adult, Youth and Dislocated Worker Programs)

The Workforce Innovation and Opportunity Act of 2014 (WIOA), which supersedes the Workforce Investment Act of 1998 (WIA), authorizes formula grant programs to States to help job seekers access employment, education, training and support services to succeed in the labor market. Using a variety of methods, States provide employment and training

services through a network of American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name). The WIOA programs provide employment and training programs for adults, dislocated workers, and youth, and WagnerPeyser employment services administered by the Department of Labor (DOL). The programs also provide adult education and literacy services that complement the Vocational Rehabilitation State grants awarded by the U.S. Department of Education that assist individuals with disabilities in obtaining employment and helps job seekers to achieve gainful employment. Youth employment and educational services are available to eligible out-of-school youth, ages 16 to 24, and low-income in-school youth, ages 14-21, that face barriers to employment.

### 5. Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T)

The objective of SNAP is to help low-income households buy the food they need for good health and to provide Employment and Training (E& T) activities.

### 6. Re-Employment Services and Eligibility Assessment (RESEA)

The RESEA program is designed to help unemployment insurance claimants return to work faster.

## VII. Agency Monitoring Cycle

Monitoring Cycle: October 1, 2018 - September 30, 2019

The Tennessee Department of Labor and Workforce Development will monitor all open contracts with expenditures as of October 1, 2018. Doing so fulfills the requirements under Central Procurement Office Grant Management and Subrecipient Monitoring Policy and Procedures, Policy Number 2013-007. Due to the realignment of the State's workforce system from 13 Local Workforce Development Areas (LWDAs) to 9 LWDAs, contracts from previous monitoring cycles will be closed and new contracts will be opened throughout the year. Appendices C-1 and C-2, included within this document, are current as of October 1, 2018.

## VIII. FTE Monitoring Staff

Please refer to Appendix A on page 18.

## IX. Corrective Action/Monitoring Report Procedure

1. Compliance and Policy Unit and Grants and Budgets Unit staff members update the TDLWD's monitoring guide based on guidelines and requirements from the General Services Monitoring Policy. The monitoring guide will include lists of contracts, fiscal and program questionnaires for all WIOA programs, and a risk assessment chart.
2. The Director of the Compliance and Policy Unit forwards the updated monitoring guide, with a letter, to General Services by October 1 of each year; negotiations will take place until the monitoring guide is formally approved.
3. When the monitoring guide has been approved by General Services then a copy is sent to the Communications Office of TDLWD to be placed on TDLWD's website. Furthermore, a copy is sent to the PAR Unit.
4. Compliance and Policy staff receives a notice from the PAR Unit thirty (30) business days prior to a monitoring visit. Compliance and Policy staff enters the projected date of the review on a monitoring tracking spreadsheet (that is shared between the PAR and Compliance and Monitoring Units).

5. Before issuing the final results of the monitoring report, the PAR Unit forwards the results to the Compliance and Policy Director. The Compliance and Policy Director will review and discuss the results with the Grants and Budgets Unit and Workforce Services (WFS) management.
6. A report will be issued by the PAR Unit within thirty (30) business days of the completion of the review. Copies of the report will be dispersed to the following parties: the Commissioner and Deputy Commissioner of the Tennessee Department of Labor and Workforce Development, the Regional Director of the reviewed area, the Local Area Director of the reviewed area, the Administrator of Workforce Services, Assistant Administrator of Workforce Services, Compliance and Policy Director, the Director of Grants and Budgets, and other appropriate staff as necessary.
7. WFS staff will forward the report to the LWDA CLEO and LWDB Board Chair.
8. If there is no finding — and no corrective action is needed — Compliance and Policy staff enters the date on which the monitoring report is issued, the date on which the monitoring report is received, and the expression of "no findings reported" on the spreadsheet.
9. If there is a finding, the entity monitored will submit the Corrective Action Plan (CAP) within thirty (30) business days after the receipt of the monitoring results. If the CAP submitted by the entity is not accepted, Compliance and Policy unit will forward a notice — offering technical assistance from the appropriate TDLWD subject matter unit/staff — to the entity.
    - The process of thirty (30) business day limits will continue until the entity has corrected the findings.
10. If the CAP does not arrive within thirty (30) business days, or if the CAP is not accepted by Compliance and Policy Unit, a notice will be sent to the entity or technical assistance will be provided by the appropriate TDWLD subject matter unit/staff.
    - The process of thirty (30) business day limits will continue until the entity has corrected the findings.
11. If findings are rendered to be significant in terms of failure to perform, or include serious infractions of oversight, or if the local area fails to properly or timely remedy the findings, TDLWD will present the matter to the SWDB under WIOA Section 107(c)(3) as it relates to the LWDB's ability to fulfill their functions.
12. Compliance and Policy Unit will forward the final acceptance to the LWDA CLEO, LWDB Chair, LWDA Executive Director, and Staff to the LWDB.

## X. Tennessee Department of Labor and Workforce Development Contact Information

**Program Contact Information:**
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## XI. Disclaimer

This guide outlines the steps, procedures, process, and methods utilized by TDLWD in accordance with both state and federal regulations associated with the administration of WIOA funds. In addition to the documents within this guide, TDLWD will utilize internal participant attribute sheets to review individual participant data. These attributes sheets are not included in this guide, however the steps, procedures, process, and methods outlined in this guide will govern the utilization of the review and collection of the data via the participant attribute sheets.

## XII. Total Subrecipient Contracts

Total subrecipient contracts are demonstrated in Appendix B on page 19, current as of October 1, 2018. This list is subject to change due to the realignment of Tennessee's workforce development system. Pursuant to Section *9.2.4 Changes to Monitoring Plans* in Policy Number 2013-007, the TDLWD will propose changes in November 2018 and as needed. These changes are subject to approval by the Central Procurement Office.

## XIII. Total Subrecipient Contracts Population and Contracts to be Monitored

Total subrecipient contracts population is demonstrated in Appendix C-1 on page 20. Total subrecipient contracts to be monitored as demonstrated in Appendix C-2 on page 25. Both Appendices are current as of October 1, 2018. Subrecipient contracts, as well as those to be monitored, are subject to change due to the realignment of Tennessee's workforce development system. Pursuant to Section 9.2.4 Changes to Monitoring Plans in Policy Number 2013-007, the TDLWD will propose changes in November 2018 and as needed, pending receipt of the Fiscal Year Notices of Obligation for Adult and Dislocated Worker Grants, as well as deobligation and

reallotment of contracts due to realignment. These changes are subject to approval by the Central Procurement Office.

## XIV. Subrecipient Risk Assessment

Please refer to Appendix D on page 27.

## XV. Explanation of Previous Cycle Monitoring Findings

Please refer to Appendix E on page 28.

## XVI. Duties and Controls

Please refer to Appendix F on page 32.

## XVII. Program Monitoring Guides

Please refer to Appendix G on page 37.

## XVIII. Equal Employment Opportunity Questionnaire

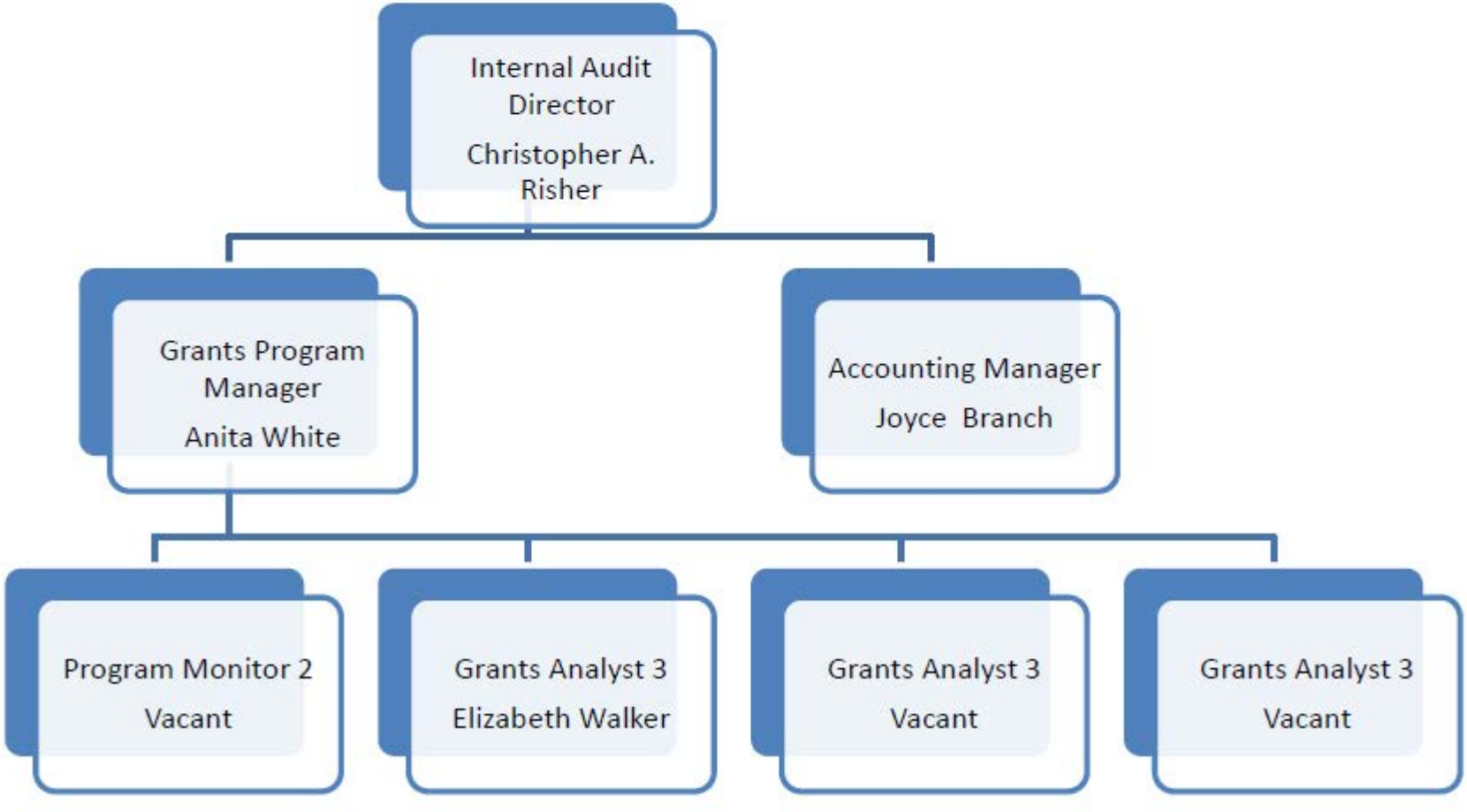
Please refer to Appendix H on page 57.

## XIX. Supplemental Nutrition Assistance Program Questionnaire

Please refer to Appendix I on page 64.

## VIII. FTE Monitoring Staff

TDLWD has seven (7) Full Time Equivalent (FTE) positions responsible for monitoring all WIOA programs. Currently there are three (3) full time staff involved in monitoring formula, Statewide funds, National Dislocated Worker Grant (DWG), incentive contracts, and all other WIOA contracts that are not closed.



# Appendix B: Total Subrecipient Contracts

| Row Labels |
| --- |
| Alliance For Business And Training |
| City of Memphis |
| East Tennessee Human Resource Agency Inc |
| Goodwill Industries - Knoxville, Inc. |
| Knoxville/Knox Co CAC |
| Meritan Inc |
| Nashville Career Advancement Ctr |
| North Tennessee Workforce Board |
| Northwest Tennessee Workforce Board |
| Shelby County Government |
| South Central Tennessee Development District |
| South Central Tennessee Workforce Allian |
| Southeast TN Development District |
| Southwest Human Resource Agency |
| Tennessee Community Services Agency |
| Upper Cumberland Development District |
| Walters State Community College |
| Workforce Solutions |
| The University of Tennessee |
| **Grand Total** |

## Appendix C-1 Total Subrecipient Contracts Population as of 10-1-2018

| Subrecipient | LWDA | Fiscal Year | Contract Type | Contract Number | Project Start Date | Project End Date | Grant Amount |
|---|---|---|---|---|---|---|---|
| Alliance For Business And Training | LW01 | F17 | TFSWA | LW01F171TFSWA17 | 7/1/2018 | 11/14/2018 | $94,000.00 |
| Alliance For Business And Training | LW01 | F18 | ADULT | LW01F181ADULT18 | 10/1/2017 | 6/30/2020 | $778,926.00 |
| Alliance For Business And Training | LW01 | F18 | DSLWK | LW01F181DSLWK18 | 10/1/2017 | 6/30/2020 | $854,718.00 |
| Alliance For Business And Training | LW01 | F18 | RESEA | LW01F181RESEA18 | 4/1/2018 | 9/30/2019 | $8,667.00 |
| Alliance For Business And Training | LW01 | P16 | MNSWA | LW01P161MNSWA17 | 7/1/2018 | 11/14/2018 | $9,400.00 |
| Alliance For Business And Training | LW01 | P17 | YOUTH | LW01P171YOUTH18 | 4/1/2017 | 6/30/2020 | $884,511.00 |
| Alliance For Business And Training | LW01 | P17 | ADULT | LW01P172ADULT18 | 7/1/2017 | 6/30/2020 | $569.00 |
| Alliance For Business And Training | LW01 | P17 | DSLWK | LW01P172DSLWK18 | 7/1/2017 | 6/30/2020 | $20,754.00 |
| Alliance For Business And Training | LW01 | P17 | YOUTH | LW01P172YOUTH18 | 4/1/2017 | 6/30/2020 | $3,860.00 |
| Alliance For Business And Training | LW01 | P18 | YOUTH | LW01P181YOUTH19 | 4/1/2018 | 6/30/2021 | $630,253.00 |
| Alliance For Business And Training | LWNE | P17 | MNSWA | LWNEP171MNSWA18 | 7/1/2018 | 12/31/2018 | $30,013.00 |
| Alliance For Business And Training | LWNE | P17 | TFSWA | LWNEP171TFSWA18 | 7/1/2018 | 12/31/2018 | $350,138.00 |
| Alliance For Business And Training | LWNE | P18 | ADULT | LWNEP181ADULT19 | 7/1/2018 | 6/30/2021 | $205,132.00 |
| Alliance For Business And Training | LWNE | P18 | DSLWK | LWNEP181DSLWK19 | 7/1/2018 | 6/30/2021 | $186,077.00 |
| Alliance For Business And Training | LWNE | P18 | SCSEP | LWNEP181SCSEP19 | 7/1/2018 | 6/30/2019 | $211,646.00 |
| Alliance For Business And Training | LWNE | P18 | YOUTH | LWNEP181YOUTH19 | 4/1/2018 | 6/30/2021 | $630,252.00 |
| Alliance For Business And Training | LW01 | F18 | QSNAP | LW01F181QSNAP18 | 10/1/2017 | 9/30/2018 | $54,108.00 |
| City of Memphis | LW13 | F18 | ADULT | LW13F181ADULT18 | 10/1/2017 | 6/30/2020 | $2,390,757.00 |
| City of Memphis | LW13 | F18 | DSLWK | LW13F181DSLWK18 | 10/1/2017 | 6/30/2020 | $2,103,726.00 |
| City of Memphis | LW13 | F18 | MNSWA | LW13F181MNSWA18 | 4/30/2018 | 6/30/2020 | $146,542.00 |
| City of Memphis | LW13 | F18 | RESEA | LW13F181RESEA18 | 4/1/2018 | 9/30/2019 | $8,667.00 |
| City of Memphis | LW13 | F18 | SERSP | LW13F181SERSP18 | 4/30/2018 | 6/30/2020 | $1,318,881.00 |
| City of Memphis | LW13 | F18 | SESWA | LW13F181SESWA18 | 8/7/2018 | 6/30/2020 | $618,881.00 |
| City of Memphis | LW13 | P16 | MNSWA | LW13P161MNSWA17 | 7/1/2018 | 11/14/2018 | $187,108.00 |
| City of Memphis | LW13 | P16 | WP325 | LW13P162WP32517 | 4/30/2018 | 6/30/2019 | $81,900.00 |
| City of Memphis | LW13 | P17 | ADULT | LW13P171ADULT18 | 7/1/2017 | 6/30/2020 | $351,270.00 |
| City of Memphis | LW13 | P17 | DSLWK | LW13P171DSLWK18 | 7/1/2017 | 6/30/2020 | $397,559.00 |
| City of Memphis | LW13 | P17 | YOUTH | LW13P171YOUTH18 | 4/1/2017 | 6/30/2020 | $2,981,558.00 |
| City of Memphis | LW13 | P17 | ADULT | LW13P172ADULT18 | 7/1/2017 | 6/30/2020 | $1,765.00 |
| City of Memphis | LW13 | P17 | DSLWK | LW13P172DSLWK18 | 7/1/2017 | 6/30/2020 | $59,077.00 |
| City of Memphis | LW13 | P17 | YOUTH | LW13P172YOUTH18 | 4/1/2017 | 6/30/2020 | $13,010.00 |
| City of Memphis | LW13 | P18 | YOUTH | LW13P181YOUTH19 | 4/1/2018 | 6/30/2021 | $1,698,301.00 |
| City of Memphis | LW13 | P16 | DSLWK | LW13P161DSLWK17 | 7/1/2016 | 6/30/2019 | $434,118.00 |
| City of Memphis | LW13 | F18 | QSNAP | LW13F181QSNAP18 | 10/1/2017 | 9/30/2018 | $187,500.00 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | ADULT | LW04F181ADULT18 | 10/1/2017 | 6/30/2020 | $977,375.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P16 | DSLWK | LW04P161DSLWK17 | 7/1/2016 | 6/30/2019 | $168,569.00 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | DSLWK | LW04F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,037,386.00 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | RESEA | LW04F181RESEA18 | 4/1/2018 | 9/30/2019 | $17,333.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P16 | MNSWA | LW04P161MNSWA17 | 7/1/2018 | 11/14/2018 | $34,589.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | DSLWK | LW04P171DSLWK18 | 7/1/2017 | 6/30/2020 | $169,509.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P16 | TFRSP | LW04P161TFRSP17 | 7/1/2018 | 11/14/2018 | $345,893.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | ADULT | LW04P171ADULT18 | 7/1/2017 | 6/30/2020 | $141,905.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | YOUTH | LW04P171YOUTH18 | 4/1/2017 | 6/30/2020 | $1,042,637.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | ADULT | LW04P172ADULT18 | 7/1/2017 | 6/30/2020 | $713.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | DSLWK | LW04P172DSLWK18 | 7/1/2017 | 6/30/2020 | $25,189.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | YOUTH | LW04P172YOUTH18 | 4/1/2017 | 6/30/2020 | $4,550.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P18 | YOUTH | LW04P181YOUTH19 | 4/1/2018 | 6/30/2021 | $464,340.00 |
| East Tennessee Human Resource Agency Inc | LWET | P17 | MNSWA | LWETP171MNSWA18 | 7/1/2018 | 12/31/2018 | $66,749.00 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| East Tennessee Human Resource Agency Inc | LWET | P17 | TFSWA | LWETP171TFSWA18 | 7/1/2018 | 12/31/2018 | $667,483.00 |
| East Tennessee Human Resource Agency Inc | LWET | P18 | ADULT | LWETP181ADULT19 | 7/1/2018 | 6/30/2021 | $412,738.00 |
| East Tennessee Human Resource Agency Inc | LWET | P18 | DSLWK | LWETP181DSLWK19 | 7/1/2018 | 6/30/2021 | $433,212.00 |
| East Tennessee Human Resource Agency Inc | LWET | P18 | SCSEP | LWETP181SCSEP19 | 7/1/2018 | 6/30/2019 | $276,059.00 |
| East Tennessee Human Resource Agency Inc | LWET | P18 | YOUTH | LWETP181YOUTH19 | 4/1/2018 | 6/30/2021 | $1,328,242.00 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | QSNAP | LW04F181QSNAP18 | 10/1/2017 | 9/30/2018 | $38,000.00 |
| Goodwill Industries - Knoxville, Inc. | LW14 | F18 | SSNAP | LW14F181SSNAP18 | 10/1/2017 | 9/30/2018 | $274,053.00 |
| Knoxville/Knox Co CAC | LW03 | P17 | ADULT | LW03P171ADULT18 | 7/1/2017 | 6/30/2020 | $92,726.00 |
| Knoxville/Knox Co CAC | LW03 | P17 | DSLWK | LW03P171DSLWK18 | 7/1/2017 | 6/30/2020 | $132,621.00 |
| Knoxville/Knox Co CAC | LW03 | F17 | TFSWA | LW03F171TFSWA17 | 7/1/2018 | 11/14/2018 | $362,108.00 |
| Knoxville/Knox Co CAC | LW03 | F17 | CRSWA | LW03F172CRSWA17 | 5/2/2018 | 6/30/2019 | $364,000.00 |
| Knoxville/Knox Co CAC | LW03 | F18 | ADULT | LW03F181ADULT18 | 10/1/2017 | 6/30/2020 | $638,650.00 |
| Knoxville/Knox Co CAC | LW03 | F18 | DSLWK | LW03F181DSLWK18 | 10/1/2017 | 6/30/2020 | $811,635.00 |
| Knoxville/Knox Co CAC | LW03 | P16 | MNSWA | LW03P161MNSWA17 | 7/1/2018 | 11/14/2018 | $36,210.00 |
| Knoxville/Knox Co CAC | LW03 | P17 | YOUTH | LW03P171YOUTH18 | 4/1/2017 | 6/30/2020 | $880,349.00 |
| Knoxville/Knox Co CAC | LW03 | P17 | ADULT | LW03P172ADULT18 | 7/1/2017 | 6/30/2020 | $466.00 |
| Knoxville/Knox Co CAC | LW03 | P17 | DSLWK | LW03P172DSLWK18 | 7/1/2017 | 6/30/2020 | $19,707.00 |
| Knoxville/Knox Co CAC | LW03 | P17 | YOUTH | LW03P172YOUTH18 | 4/1/2017 | 6/30/2020 | $3,841.00 |
| Knoxville/Knox Co CAC | LW03 | P18 | YOUTH | LW03P181YOUTH19 | 4/1/2018 | 6/30/2021 | $465,015.00 |
| Knoxville/Knox Co CAC | LW03 | F18 | QSNAP | LW03F181QSNAP18 | 10/1/2017 | 9/30/2018 | $62,439.00 |
| Meritan Inc | LW19 | P18 | SCSEP | LW19P181SCSEP19 | 7/1/2018 | 6/30/2019 | $423,291.00 |
| Nashville Career Advancement Ctr | LW09 | F17 | TFSWA | LW09F171TFSWA17 | 7/1/2018 | 11/14/2018 | $658,000.00 |
| Nashville Career Advancement Ctr | LW09 | F18 | ADULT | LW09F181ADULT18 | 10/1/2017 | 6/30/2020 | $1,414,224.00 |
| Nashville Career Advancement Ctr | LW09 | F18 | DSLWK | LW09F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,705,556.00 |
| Nashville Career Advancement Ctr | LW09 | F18 | RESEA | LW09F181RESEA18 | 4/1/2018 | 9/30/2019 | $8,667.00 |
| Nashville Career Advancement Ctr | LW09 | P16 | MNSWA | LW09P161MNSWA17 | 7/1/2018 | 11/14/2018 | $73,111.00 |
| Nashville Career Advancement Ctr | LW09 | P17 | YOUTH | LW09P171YOUTH18 | 4/1/2017 | 6/30/2020 | $1,794,243.00 |
| Nashville Career Advancement Ctr | LW09 | P17 | ADULT | LW09P172ADULT18 | 7/1/2017 | 6/30/2020 | $1,044.00 |
| Nashville Career Advancement Ctr | LW09 | P17 | DSLWK | LW09P172DSLWK18 | 7/1/2017 | 6/30/2020 | $47,896.00 |
| Nashville Career Advancement Ctr | LW09 | P17 | YOUTH | LW09P172YOUTH18 | 4/1/2017 | 6/30/2020 | $7,829.00 |
| Nashville Career Advancement Ctr | LW09 | P18 | YOUTH | LW09P181YOUTH19 | 4/1/2018 | 6/30/2021 | $889,621.00 |
| Nashville Career Advancement Ctr | LW09 | P17 | ADULT | LW09P171ADULT18 | 7/1/2017 | 6/30/2020 | $207,790.00 |
| Nashville Career Advancement Ctr | LW09 | P17 | DSLWK | LW09P171DSLWK18 | 7/1/2017 | 6/30/2020 | $322,313.00 |
| Nashville Career Advancement Ctr | LW09 | F18 | QSNAP | LW09F181QSNAP18 | 10/1/2017 | 9/30/2018 | $94,036.00 |
| North Tennessee Workforce Board | LW08 | F17 | TFSWA | LW08F171TFSWA17 | 7/1/2018 | 11/14/2018 | $614,045.00 |
| North Tennessee Workforce Board | LW08 | F17 | MNSWA | LW08F173MNSWA17 | 4/11/2018 | 12/31/2018 | $6,250.00 |
| North Tennessee Workforce Board | LW08 | F18 | ADULT | LW08F181ADULT18 | 10/1/2017 | 6/30/2020 | $894,230.00 |
| North Tennessee Workforce Board | LW08 | F18 | DSLWK | LW08F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,147,703.00 |
| North Tennessee Workforce Board | LW08 | F18 | MNSWA | LW08F181MNSWA18 | 4/30/2018 | 6/30/2019 | $7,244.00 |
| North Tennessee Workforce Board | LW08 | F18 | RESEA | LW08F181RESEA18 | 4/1/2018 | 9/30/2019 | $43,333.00 |
| North Tennessee Workforce Board | LW08 | P16 | MNSWA | LW08P161MNSWA17 | 7/1/2018 | 11/14/2018 | $61,405.00 |
| North Tennessee Workforce Board | LW08 | P16 | WP325 | LW08P161WP32517 | 7/1/2017 | 6/30/2019 | $369,972.00 |
| North Tennessee Workforce Board | LW08 | P17 | ADULT | LW08P172ADULT18 | 7/1/2017 | 6/30/2020 | $660.00 |
| North Tennessee Workforce Board | LW08 | P17 | DSLWK | LW08P172DSLWK18 | 7/1/2017 | 6/30/2020 | $32,230.00 |
| North Tennessee Workforce Board | LW08 | P17 | YOUTH | LW08P172YOUTH18 | 4/1/2017 | 6/30/2020 | $1,026,746.85 |
| North Tennessee Workforce Board | LW08 | P17 | YOUTH | LW08P173YOUTH18 | 4/1/2017 | 6/30/2020 | $4,544.00 |
| North Tennessee Workforce Board | LW08 | P18 | YOUTH | LW08P181YOUTH19 | 4/1/2018 | 6/30/2021 | $534,311.00 |
| North Tennessee Workforce Board | LWNM | P17 | MNSWA | LWNMP171MNSWA18 | 7/1/2018 | 12/31/2018 | $82,881.00 |
| North Tennessee Workforce Board | LWNM | P18 | ADULT | LWNMP181ADULT19 | 7/1/2018 | 6/30/2021 | $423,958.00 |
| North Tennessee Workforce Board | LWNM | P18 | DSLWK | LWNMP181DSLWK19 | 7/1/2018 | 6/30/2021 | $595,720.00 |
| North Tennessee Workforce Board | LWNM | P18 | TFSWA | LWNMP181TFSWA19 | 7/1/2018 | 12/31/2018 | $775,472.00 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| North Tennessee Workforce Board | LWNM | P18 | YOUTH | LWNMP181YOUTH19 | 4/1/2018 | 6/30/2021 | $1,423,931.00 |
| North Tennessee Workforce Board | LWNW | P18 | ADULT | LWNWP181ADULT19 | 7/1/2018 | 6/30/2021 | $122,183.00 |
| North Tennessee Workforce Board | LW08 | F18 | QSNAP | LW08F181QSNAP18 | 10/1/2017 | 9/30/2018 | $78,699.00 |
| Northwest Tennessee Workforce Board | LW12 | F17 | TFSWA | LW12F171TFSWA17 | 7/1/2018 | 11/14/2018 | $527,250.00 |
| Northwest Tennessee Workforce Board | LW12 | F17 | ADRSP | LW12F177ADRSP17 | 5/18/2018 | 6/30/2019 | $475,000.00 |
| Northwest Tennessee Workforce Board | LW12 | F18 | ADULT | LW12F181ADULT18 | 10/1/2017 | 6/30/2020 | $925,702.00 |
| Northwest Tennessee Workforce Board | LW12 | F18 | DSLWK | LW12F181DSLWK18 | 10/1/2017 | 6/30/2020 | $903,450.00 |
| Northwest Tennessee Workforce Board | LW12 | F18 | RESEA | LW12F181RESEA18 | 4/1/2018 | 9/30/2019 | $60,667.00 |
| Northwest Tennessee Workforce Board | LW12 | P16 | MNSWA | LW12P161MNSWA17 | 7/1/2018 | 11/14/2018 | $52,725.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | DSLWK | LW12P172DSLWK18 | 7/1/2017 | 6/30/2020 | $21,937.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | YOUTH | LW12P172YOUTH18 | 4/1/2017 | 6/30/2020 | $983,408.40 |
| Northwest Tennessee Workforce Board | LW12 | P18 | YOUTH | LW12P181YOUTH19 | 4/1/2018 | 6/30/2021 | $384,885.00 |
| Northwest Tennessee Workforce Board | LWNW | P17 | MNSWA | LWNWP171MNSWA18 | 7/1/2018 | 12/31/2018 | $16,575.00 |
| Northwest Tennessee Workforce Board | LWNW | P17 | TFSWA | LWNWP171TFSWA18 | 7/1/2018 | 12/31/2018 | $165,750.00 |
| Northwest Tennessee Workforce Board | LWNW | P18 | DSLWK | LWNWP181DSLWK19 | 7/1/2018 | 6/30/2021 | $117,088.00 |
| Northwest Tennessee Workforce Board | LWNW | P18 | YOUTH | LWNWP181YOUTH19 | 4/1/2018 | 6/30/2021 | $384,884.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | ADULT | LW12P171ADULT18 | 7/1/2017 | 6/30/2020 | $134,403.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | DSLWK | LW12P171DSLWK18 | 7/1/2017 | 6/30/2020 | $147,624.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | ADULT | LW12P172ADULT18 | 7/1/2017 | 6/30/2020 | $675.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | YOUTH | LW12P173YOUTH18 | 4/1/2017 | 6/30/2020 | $4,594.00 |
| Shelby County Government | LWGM | F18 | MNSWA | LWGMF181MNSWA18 | 7/1/2018 | 12/31/2018 | $279,683.00 |
| Shelby County Government | LWGM | F18 | TFSWA | LWGMF181TFSWA18 | 7/1/2018 | 12/31/2018 | $1,423,103.00 |
| Shelby County Government | LWGM | F18 | TFSWA | LWGMF182TFSWA18 | 7/1/2018 | 12/31/2018 | $1,094,039.00 |
| Shelby County Government | LWGM | P18 | ADULT | LWGMP181ADULT19 | 7/1/2018 | 6/30/2021 | $502,638.00 |
| Shelby County Government | LWGM | P18 | DSLWK | LWGMP181DSLWK19 | 7/1/2018 | 6/30/2021 | $522,343.00 |
| Shelby County Government | LWGM | P18 | YOUTH | LWGMP181YOUTH19 | 4/1/2018 | 6/30/2021 | $1,698,301.00 |
| South Central Tennessee Development District | LWSM | P17 | MNSWA | LWSMP171MNSWA18 | 7/1/2018 | 12/31/2018 | $56,434.00 |
| South Central Tennessee Development District | LWSM | P18 | ADULT | LWSMP181ADULT19 | 7/1/2018 | 6/30/2021 | $133,953.00 |
| South Central Tennessee Development District | LWSM | P18 | DSLWK | LWSMP181DSLWK19 | 7/1/2018 | 6/30/2021 | $147,358.00 |
| South Central Tennessee Development District | LWSM | P18 | TFSWA | LWSMP181TFSWA19 | 7/1/2018 | 12/31/2018 | $564,349.00 |
| South Central Tennessee Development District | LWSM | P18 | YOUTH | LWSMP181YOUTH19 | 4/1/2018 | 6/30/2021 | $422,116.00 |
| South Central Tennessee Workforce Allian | LW10 | P17 | ADULT | LW10P171ADULT18 | 7/1/2017 | 6/30/2020 | $65,320.00 |
| South Central Tennessee Workforce Allian | LW10 | P17 | DSLWK | LW10P171DSLWK18 | 7/1/2017 | 6/30/2020 | $89,252.00 |
| South Central Tennessee Workforce Allian | LW10 | F17 | TFSWA | LW10F171TFSWA17 | 7/1/2018 | 11/14/2018 | $328,045.00 |
| South Central Tennessee Workforce Allian | LW10 | F18 | ADULT | LW10F181ADULT18 | 10/1/2017 | 6/30/2020 | $449,894.00 |
| South Central Tennessee Workforce Allian | LW10 | F18 | DSLWK | LW10F181DSLWK18 | 10/1/2017 | 6/30/2020 | $546,221.00 |
| South Central Tennessee Workforce Allian | LW10 | F18 | RESEA | LW10F181RESEA18 | 4/1/2018 | 9/30/2019 | $8,667.00 |
| South Central Tennessee Workforce Allian | LW10 | P16 | MNSWA | LW10P161MNSWA17 | 7/1/2018 | 11/14/2018 | $32,805.00 |
| South Central Tennessee Workforce Allian | LW10 | P17 | YOUTH | LW10P171YOUTH18 | 4/1/2017 | 6/30/2020 | $519,704.00 |
| South Central Tennessee Workforce Allian | LW10 | P17 | ADULT | LW10P172ADULT18 | 7/1/2017 | 6/30/2020 | $329.00 |
| South Central Tennessee Workforce Allian | LW10 | P17 | DSLWK | LW10P172DSLWK18 | 7/1/2017 | 6/30/2020 | $13,263.00 |
| South Central Tennessee Workforce Allian | LW10 | P17 | YOUTH | LW10P172YOUTH18 | 4/1/2017 | 6/30/2020 | $2,267.00 |
| South Central Tennessee Workforce Allian | LW10 | P18 | YOUTH | LW10P181YOUTH19 | 4/1/2018 | 6/30/2021 | $251,984.00 |
| South Central Tennessee Workforce Allian | LW10 | F18 | QSNAP | LW10F181QSNAP18 | 10/1/2017 | 9/30/2018 | $12,600.00 |
| Southeast TN Development District | LW05 | P16 | DSLWK | LW05P161DSLWK17 | 7/1/2016 | 6/30/2019 | $223,291.00 |
| Southeast TN Development District | LW05 | F18 | ADULT | LW05F181ADULT18 | 10/1/2017 | 6/30/2020 | $1,180,165.00 |
| Southeast TN Development District | LW05 | F18 | DSLWK | LW05F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,409,244.00 |
| Southeast TN Development District | LW05 | F18 | RESEA | LW05F181RESEA18 | 4/1/2018 | 9/30/2019 | $17,333.00 |
| Southeast TN Development District | LW05 | P16 | MNSWA | LW05P161MNSWA17 | 7/1/2018 | 11/14/2018 | $32,926.00 |
| Southeast TN Development District | LW05 | P17 | YOUTH | LW05P161MNSWA17 | 4/1/2017 | 6/30/2020 | $1,393,891.00 |
| Southeast TN Development District | LW05 | P16 | TFRSP | LW05P161TFRSP17 | 7/1/2018 | 11/14/2018 | $359,074.00 |

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|---|---|---|---|---|---|---|---|
| Southeast TN Development District | LW05 | P17 | ADULT | LW05P171ADULT18 | 7/1/2017 | 6/30/2020 | $171,348.00 |
| Southeast TN Development District | LW05 | P17 | DSLWK | LW05P171DSLWK18 | 7/1/2017 | 6/30/2020 | $230,270.00 |
| Southeast TN Development District | LW05 | P17 | ADULT | LW05P172ADULT18 | 7/1/2017 | 6/30/2020 | $861.00 |
| Southeast TN Development District | LW05 | P17 | DSLWK | LW05P172DSLWK18 | 7/1/2017 | 6/30/2020 | $34,218.00 |
| Southeast TN Development District | LW05 | P17 | YOUTH | LW05P172YOUTH18 | 4/1/2017 | 6/30/2020 | $6,082.00 |
| Southeast TN Development District | LW05 | P18 | YOUTH | LW05P181YOUTH19 | 4/1/2018 | 6/30/2021 | $770,969.00 |
| Southeast TN Development District | LWSE | P17 | MNSWA | LWSEP171MNSWA18 | 7/1/2018 | 12/31/2018 | $13,170.00 |
| Southeast TN Development District | LWSE | P17 | TFSWA | LWSEP171TFSWA18 | 7/1/2018 | 12/31/2018 | $140,830.00 |
| Southeast TN Development District | LWSE | P18 | ADULT | LWSEP181ADULT19 | 7/1/2018 | 6/30/2021 | $237,327.00 |
| Southeast TN Development District | LWSE | P18 | DSLWK | LWSEP181DSLWK19 | 7/1/2018 | 6/30/2021 | $266,202.00 |
| Southeast TN Development District | LWSE | P18 | YOUTH | LWSEP181YOUTH19 | 4/1/2018 | 6/30/2021 | $770,968.00 |
| Southeast TN Development District | LW05 | P17 | YOUTH | LW05P171YOUTH18 | 4/1/2017 | 6/30/2019 | $1,401,797.00 |
| Southeast TN Development District | LW05 | F18 | QSNAP | LW05F181QSNAP18 | 10/1/2017 | 9/30/2018 | $33,140.00 |
| Southwest Human Resource Agency | LW11 | F17 | TFSWA | LW11F171TFSWA17 | 7/1/2018 | 11/14/2018 | $623,350.00 |
| Southwest Human Resource Agency | LW11 | F18 | ADULT | LW11F181ADULT18 | 10/1/2017 | 6/30/2020 | $642,262.00 |
| Southwest Human Resource Agency | LW11 | F18 | DSLWK | LW11F181DSLWK18 | 10/1/2017 | 6/30/2020 | $626,521.00 |
| Southwest Human Resource Agency | LW11 | F18 | RESEA | LW11F181RESEA18 | 4/1/2018 | 9/30/2019 | $17,333.00 |
| Southwest Human Resource Agency | LW11 | P16 | MNSWA | LW11P161MNSWA17 | 7/1/2018 | 11/14/2018 | $62,335.00 |
| Southwest Human Resource Agency | LW11 | P17 | ADULT | LW11P171ADULT18 | 7/1/2017 | 6/30/2020 | $93,250.00 |
| Southwest Human Resource Agency | LW11 | P17 | DSLWK | LW11P171DSLWK18 | 7/1/2017 | 6/30/2020 | $102,373.00 |
| Southwest Human Resource Agency | LW11 | P17 | YOUTH | LW11P171YOUTH18 | 4/1/2017 | 6/30/2020 | $709,343.88 |
| Southwest Human Resource Agency | LW11 | P17 | ADULT | LW11P172ADULT18 | 7/1/2017 | 6/30/2020 | $469.00 |
| Southwest Human Resource Agency | LW11 | P17 | DSLWK | LW11P172DSLWK18 | 7/1/2017 | 6/30/2020 | $15,213.00 |
| Southwest Human Resource Agency | LW11 | P17 | YOUTH | LW11P173YOUTH18 | 4/1/2017 | 6/30/2020 | $3,150.00 |
| Southwest Human Resource Agency | LW11 | P18 | YOUTH | LW11P181YOUTH19 | 4/1/2018 | 6/30/2021 | $376,781.00 |
| Southwest Human Resource Agency | LWSW | F18 | MNSWA | LWSWF181MNSWA18 | 7/9/2018 | 6/30/2019 | $8,496.00 |
| Southwest Human Resource Agency | LWSW | F18 | SESWA | LWSWF181SESWA18 | 7/9/2018 | 6/30/2019 | $169,920.00 |
| Southwest Human Resource Agency | LWSW | P17 | MNSWA | LWSWP171MNSWA18 | 7/1/2018 | 12/31/2018 | $21,417.00 |
| Southwest Human Resource Agency | LWSW | P17 | TFSWA | LWSWP171TFSWA18 | 7/1/2018 | 12/31/2018 | $214,170.00 |
| Southwest Human Resource Agency | LWSW | P18 | ADULT | LWSWP181ADULT19 | 7/1/2018 | 6/30/2021 | $121,185.00 |
| Southwest Human Resource Agency | LWSW | P18 | DSLWK | LWSWP181DSLWK19 | 7/1/2018 | 6/30/2021 | $116,506.00 |
| Southwest Human Resource Agency | LWSW | P18 | SCSEP | LWSWP181SCSEP19 | 7/1/2018 | 6/30/2019 | $184,040.00 |
| Southwest Human Resource Agency | LWSW | P18 | YOUTH | LWSWP181YOUTH19 | 4/1/2018 | 6/30/2021 | $376,780.00 |
| Southwest Human Resource Agency | LW11 | F18 | QSNAP | LW11F181QSNAP18 | 10/1/2017 | 9/30/2018 | $11,943.00 |
| Tennessee Community Services Agency | LW20 | P18 | SCSEP | LW20P181SCSEP19 | 7/1/2018 | 6/30/2019 | $257,655.00 |
| The University of Tennessee | LW21 | F18 | QSNAP | LW21F181QSNAP18 | 10/1/2017 | 9/30/2018 | $72,000.00 |
| The University of Tennessee | LW21 | F18 | SSNAP | LW21F181SSNAP18 | 2/1/2018 | 9/30/2018 | $425,531.00 |
| Upper Cumberland Development District | LW07 | F17 | ADSWA | LW07F171ADSWA17 | 7/1/2018 | 6/30/2019 | $110,000.00 |
| Upper Cumberland Development District | LW07 | F17 | DWSWA | LW07F171DWSWA17 | 7/1/2018 | 6/30/2019 | $225,000.00 |
| Upper Cumberland Development District | LW07 | F17 | MNSWA | LW07F173MNSWA17 | 7/1/2018 | 6/30/2019 | $22,500.00 |
| Upper Cumberland Development District | LW07 | F17 | MNSWA | LW07F174MNSWA17 | 7/1/2018 | 6/30/2019 | $11,000.00 |
| Upper Cumberland Development District | LW07 | F18 | RESEA | LW07F181RESEA18 | 4/1/2018 | 9/30/2019 | $26,000.00 |
| Upper Cumberland Development District | LW07 | F18 | ADULT | LW07F182ADULT18 | 10/1/2017 | 6/30/2020 | $207,241.86 |
| Upper Cumberland Development District | LW07 | F18 | DSLWK | LW07F182DSLWK18 | 10/1/2017 | 6/30/2020 | $339,871.40 |
| Upper Cumberland Development District | LW07 | P16 | MNSWA | LW07P161MNSWA17 | 7/1/2018 | 11/14/2018 | $30,000.00 |
| Upper Cumberland Development District | LW07 | P16 | YUSWA | LW07P162YUSWA17 | 7/1/2018 | 6/30/2019 | $300,000.00 |
| Upper Cumberland Development District | LW07 | P17 | DSLWK | LW07P172DSLWK18 | 7/1/2017 | 6/30/2020 | $70,109.00 |
| Upper Cumberland Development District | LW07 | P17 | YOUTH | LW07P172YOUTH18 | 4/1/2017 | 6/30/2020 | $502,374.23 |
| Upper Cumberland Development District | LW07 | P17 | DSLWK | LW07P173DSLWK18 | 7/1/2017 | 6/30/2020 | $11,366.00 |
| Upper Cumberland Development District | LW07 | P17 | YOUTH | LW07P173YOUTH18 | 4/1/2017 | 6/30/2020 | $2,506.00 |
| Upper Cumberland Development District | LW07 | P18 | YOUTH | LW07P181YOUTH19 | 4/1/2018 | 6/30/2021 | $403,701.00 |

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|---|---|---|---|---|---|---|---|
| Upper Cumberland Development District | LWUC | F18 | TFSWA | LWUCF181TFSWA18 | 7/1/2018 | 12/31/2018 | $524,520.00 |
| Upper Cumberland Development District | LWUC | P17 | MNSWA | LWUCP171MNSWA18 | 7/1/2018 | 12/31/2018 | $52,452.00 |
| Upper Cumberland Development District | LWUC | P18 | ADULT | LWUCP181ADULT19 | 7/1/2018 | 6/30/2021 | $134,155.00 |
| Upper Cumberland Development District | LWUC | P18 | DSLWK | LWUCP181DSLWK19 | 7/1/2018 | 6/30/2021 | $113,812.00 |
| Upper Cumberland Development District | LWUC | P18 | SCSEP | LWUCP181SCSEP19 | 7/1/2018 | 6/30/2019 | $184,040.00 |
| Upper Cumberland Development District | LWUC | P18 | YOUTH | LWUCP181YOUTH19 | 4/1/2018 | 6/30/2021 | $403,701.00 |
| Upper Cumberland Development District | LW07 | F18 | QSNAP | LW07F182QSNAP18 | 3/1/2018 | 9/30/2018 | $34,428.00 |
| Walters State Community College | LW02 | P17 | YOUTH | LW02P171YOUTH18 | 4/1/2017 | 6/30/2020 | $1,073,032.00 |
| Walters State Community College | LW02 | F18 | RESEA | LW02F181RESEA18 | 4/1/2018 | 9/30/2019 | $17,333.00 |
| Walters State Community College | LW02 | P17 | ADULT | LW02P172ADULT18 | 7/1/2017 | 6/30/2020 | $731.00 |
| Walters State Community College | LW02 | P17 | DSLWK | LW02P172DSLWK18 | 7/1/2017 | 6/30/2020 | $25,246.00 |
| Walters State Community College | LW02 | P17 | YOUTH | LW02P172YOUTH18 | 4/1/2017 | 6/30/2020 | $4,682.00 |
| Walters State Community College | LW02 | P18 | YOUTH | LW02P181YOUTH19 | 4/1/2018 | 6/30/2021 | $398,888.00 |
| Walters State Community College | LW02 | F18 | QSNAP | LW02F181QSNAP18 | 10/1/2017 | 9/30/2018 | $18,537.00 |
| Walters State Community College | LW02 | P17 | ADULT | LW02P171ADULT18 | 7/1/2017 | 6/30/2020 | $145,358.00 |
| Walters State Community College | LW02 | F18 | ADULT | LW02F181ADULT18 | 10/1/2017 | 6/30/2020 | $1,001,158.00 |
| Walters State Community College | LW02 | F18 | DSLWK | LW02F181DSLWK18 | 10/1/2017 | 6/30/2020 | $898,998.00 |
| Walters State Community College | LW02 | P17 | DSLWK | LW02P171DSLWK18 | 7/1/2017 | 6/30/2020 | $169,891.00 |
| Workforce Solutions | LW06 | P17 | ADULT | LW06P172ADULT18 | 7/1/2017 | 6/30/2020 | $291.00 |
| Workforce Solutions | LW06 | P17 | DSLWK | LW06P172DSLWK18 | 7/1/2017 | 6/30/2020 | $14,618.00 |
| Workforce Solutions | LW06 | P17 | YOUTH | LW06P172YOUTH18 | 4/1/2017 | 6/30/2020 | $1,894.00 |
| Workforce Solutions | LW06 | F17 | TFSWA | LW06F171TFSWA17 | 7/1/2018 | 11/14/2018 | $208,050.00 |
| Workforce Solutions | LW06 | P17 | ADULT | LW06P171ADULT18 | 7/1/2017 | 6/30/2020 | $57,889.00 |
| Workforce Solutions | LW06 | P17 | DSLWK | LW06P171DSLWK18 | 7/1/2017 | 6/30/2020 | $98,373.00 |
| Workforce Solutions | LW06 | F18 | ADULT | LW06F181ADULT18 | 10/1/2017 | 6/30/2020 | $398,697.00 |
| Workforce Solutions | LW06 | F18 | DSLWK | LW06F181DSLWK18 | 10/1/2017 | 6/30/2020 | $602,037.00 |
| Workforce Solutions | LW06 | P16 | MNSWA | LW06P161MNSWA17 | 7/1/2018 | 11/14/2018 | $20,805.00 |
| Workforce Solutions | LW06 | P17 | YOUTH | LW06P171YOUTH18 | 4/1/2017 | 6/30/2020 | $434,085.00 |
| Workforce Solutions | LW06 | P18 | YOUTH | LW06P181YOUTH19 | 4/1/2018 | 6/30/2021 | $170,134.00 |
| Workforce Solutions | LW06 | F18 | QSNAP | LW06F181QSNAP18 | 10/1/2017 | 9/30/2018 | $5,000.00 |

## Appendix C-2: Total Subrecipient Contracts to be Monitored as of 10-1-2018

| Subrecipient | LWDA | Fiscal Year | Contract Type | Contract Number | Project Start Date | Project End Date | Grant Amount | Expended as of 10/1/2018 |
|---|---|---|---|---|---|---|---|---|
| Alliance For Business And Training | LW01 | F17 | TFSWA | LW01F171TFSWA17 | 7/1/2018 | 11/14/2018 | $94,000.00 | 83,611.45 |
| Alliance For Business And Training | LW01 | F18 | ADULT | LW01F181ADULT18 | 10/1/2017 | 6/30/2020 | $778,926.00 | 690,118.35 |
| Alliance For Business And Training | LW01 | F18 | DSLWK | LW01F181DSLWK18 | 10/1/2017 | 6/30/2020 | $854,718.00 | 655,563.77 |
| Alliance For Business And Training | LW01 | P16 | MNSWA | LW01P161MNSWA17 | 7/1/2018 | 11/14/2018 | $9,400.00 | 7,949.05 |
| Alliance For Business And Training | LW01 | P17 | YOUTH | LW01P171YOUTH18 | 4/1/2017 | 6/30/2020 | $884,511.00 | 519,152.08 |
| City of Memphis | LW13 | F18 | ADULT | LW13F181ADULT18 | 10/1/2017 | 6/30/2020 | $2,390,757.00 | 1,947,045.71 |
| City of Memphis | LW13 | F18 | DSLWK | LW13F181DSLWK18 | 10/1/2017 | 6/30/2020 | $2,103,726.00 | 270,056.74 |
| City of Memphis | LW13 | P17 | ADULT | LW13P171ADULT18 | 7/1/2017 | 6/30/2020 | $351,270.00 | 284,941.69 |
| City of Memphis | LW13 | P17 | DSLWK | LW13P171DSLWK18 | 7/1/2017 | 6/30/2020 | $397,559.00 | 70,836.12 |
| City of Memphis | LW13 | P17 | YOUTH | LW13P171YOUTH18 | 4/1/2017 | 6/30/2020 | $2,981,558.00 | 782,897.47 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | ADULT | LW04F181ADULT18 | 10/1/2017 | 6/30/2020 | $977,375.00 | 935,413.66 |
| East Tennessee Human Resource Agency Inc | LW04 | P16 | DSLWK | LW04P161DSLWK17 | 7/1/2016 | 6/30/2019 | $168,569.00 | 168,569.00 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | DSLWK | LW04F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,037,386.00 | 788,095.56 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | DSLWK | LW04P171DSLWK18 | 7/1/2017 | 6/30/2020 | $169,509.00 | 169,509.00 |
| East Tennessee Human Resource Agency Inc | LW04 | P16 | TFRSP | LW04P161TFRSP17 | 7/1/2018 | 11/14/2018 | $345,893.00 | 25,246.17 |
| East Tennessee Human Resource Agency Inc | LW04 | P17 | YOUTH | LW04P171YOUTH18 | 4/1/2017 | 6/30/2020 | $1,042,637.00 | 972,884.03 |
| East Tennessee Human Resource Agency Inc | LW04 | P18 | YOUTH | LW04P181YOUTH19 | 4/1/2018 | 6/30/2021 | $464,340.00 | 34,024.42 |
| Goodwill Industries - Knoxville, Inc. | LW14 | F18 | SSNAP | LW14F181SSNAP18 | 10/1/2017 | 9/30/2018 | $274,053.00 | 16,812.72 |
| Knoxville/Knox Co CAC | LW03 | P17 | DSLWK | LW03P171DSLWK18 | 7/1/2017 | 6/30/2020 | $132,621.00 | 132,621.00 |
| Knoxville/Knox Co CAC | LW03 | F18 | ADULT | LW03F181ADULT18 | 10/1/2017 | 6/30/2020 | $638,650.00 | 633,844.28 |
| Knoxville/Knox Co CAC | LW03 | F18 | DSLWK | LW03F181DSLWK18 | 10/1/2017 | 6/30/2020 | $811,635.00 | 442,491.77 |
| Knoxville/Knox Co CAC | LW03 | P17 | YOUTH | LW03P171YOUTH18 | 4/1/2017 | 6/30/2020 | $880,349.00 | 637,327.64 |
| Meritan Inc | LW19 | P18 | SCSEP | LW19P181SCSEP19 | 7/1/2018 | 6/30/2019 | $423,291.00 | 31,804.93 |
| Nashville Career Advancement Ctr | LW09 | F18 | ADULT | LW09F181ADULT18 | 10/1/2017 | 6/30/2020 | $1,414,224.00 | 1,252,846.53 |
| Nashville Career Advancement Ctr | LW09 | F18 | DSLWK | LW09F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,705,556.00 | 943,752.60 |
| Nashville Career Advancement Ctr | LW09 | P17 | YOUTH | LW09P171YOUTH18 | 4/1/2017 | 6/30/2020 | $1,794,243.00 | 1,275,228.17 |
| Nashville Career Advancement Ctr | LW09 | P17 | DSLWK | LW09P171DSLWK18 | 7/1/2017 | 6/30/2020 | $322,313.00 | 322,313.00 |
| North Tennessee Workforce Board | LW08 | F17 | TFSWA | LW08F171TFSWA17 | 7/1/2018 | 11/14/2018 | $614,045.00 | 281,784.37 |
| North Tennessee Workforce Board | LW08 | F17 | MNSWA | LW08F173MNSWA17 | 4/11/2018 | 12/31/2018 | $6,250.00 | 3,565.19 |
| North Tennessee Workforce Board | LW08 | F18 | ADULT | LW08F181ADULT18 | 10/1/2017 | 6/30/2020 | $894,230.00 | 803,821.46 |
| North Tennessee Workforce Board | LW08 | F18 | DSLWK | LW08F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,147,703.00 | 677,276.92 |
| North Tennessee Workforce Board | LW08 | P16 | MNSWA | LW08P161MNSWA17 | 7/1/2018 | 11/14/2018 | $61,405.00 | 33,469.31 |
| North Tennessee Workforce Board | LW08 | P16 | WP325 | LW08P161WP32517 | 7/1/2017 | 6/30/2019 | $369,972.00 | 186,680.94 |
| North Tennessee Workforce Board | LW08 | P17 | YOUTH | LW08P172YOUTH18 | 4/1/2017 | 6/30/2020 | $1,026,746.85 | 990,978.45 |
| Northwest Tennessee Workforce Board | LW12 | F17 | TFSWA | LW12F171TFSWA17 | 7/1/2018 | 11/14/2018 | $527,250.00 | 265,333.04 |
| Northwest Tennessee Workforce Board | LW12 | F17 | ADRSP | LW12F177ADRSP17 | 5/18/2018 | 6/30/2019 | $475,000.00 | 77,310.34 |
| Northwest Tennessee Workforce Board | LW12 | F18 | ADULT | LW12F181ADULT18 | 10/1/2017 | 6/30/2020 | $925,702.00 | 795,615.45 |
| Northwest Tennessee Workforce Board | LW12 | F18 | DSLWK | LW12F181DSLWK18 | 10/1/2017 | 6/30/2020 | $903,450.00 | 415,373.53 |
| Northwest Tennessee Workforce Board | LW12 | F18 | RESEA | LW12F181RESEA18 | 4/1/2018 | 9/30/2019 | $60,667.00 | 29,231.52 |
| Northwest Tennessee Workforce Board | LW12 | P16 | MNSWA | LW12P161MNSWA17 | 7/1/2018 | 11/14/2018 | $52,725.00 | 35,452.59 |
| Northwest Tennessee Workforce Board | LW12 | P17 | DSLWK | LW12P172DSLWK18 | 7/1/2017 | 6/30/2020 | $21,937.00 | 16,586.16 |
| Northwest Tennessee Workforce Board | LW12 | P17 | YOUTH | LW12P172YOUTH18 | 4/1/2017 | 6/30/2020 | $983,408.40 | 962,571.13 |
| Northwest Tennessee Workforce Board | LW12 | P18 | YOUTH | LW12P181YOUTH19 | 4/1/2018 | 6/30/2021 | $384,885.00 | 5,279.60 |
| Northwest Tennessee Workforce Board | LW12 | P17 | ADULT | LW12P171ADULT18 | 7/1/2017 | 6/30/2020 | $134,403.00 | 134,403.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | DSLWK | LW12P171DSLWK18 | 7/1/2017 | 6/30/2020 | $147,624.00 | 147,624.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | ADULT | LW12P172ADULT18 | 7/1/2017 | 6/30/2020 | $675.00 | 675.00 |
| Northwest Tennessee Workforce Board | LW12 | P17 | YOUTH | LW12P173YOUTH18 | 4/1/2017 | 6/30/2020 | $4,594.00 | 4,594.00 |
| South Central Tennessee Workforce Allian | LW10 | F17 | TFSWA | LW10F171TFSWA17 | 7/1/2018 | 11/14/2018 | $328,045.00 | 76,947.29 |
| South Central Tennessee Workforce Allian | LW10 | F18 | ADULT | LW10F181ADULT18 | 10/1/2017 | 6/30/2020 | $449,894.00 | 436,030.32 |
| South Central Tennessee Workforce Allian | LW10 | F18 | DSLWK | LW10F181DSLWK18 | 10/1/2017 | 6/30/2020 | $546,221.00 | 332,343.60 |
| South Central Tennessee Workforce Allian | LW10 | P17 | YOUTH | LW10P171YOUTH18 | 4/1/2017 | 6/30/2020 | $519,704.00 | 358,049.24 |
| South Central Tennessee Workforce Allian | LW10 | P18 | YOUTH | LW10P181YOUTH19 | 4/1/2018 | 6/30/2021 | $251,984.00 | 21,080.11 |
| Southeast TN Development District | LW05 | F18 | ADULT | LW05F181ADULT18 | 10/1/2017 | 6/30/2020 | $1,180,165.00 | 921,424.46 |
| Southeast TN Development District | LW05 | F18 | DSLWK | LW05F181DSLWK18 | 10/1/2017 | 6/30/2020 | $1,409,244.00 | 825,495.78 |
| Southeast TN Development District | LW05 | P17 | ADULT | LW05P171ADULT18 | 7/1/2017 | 6/30/2020 | $171,348.00 | 150,337.42 |
| Southeast TN Development District | LW05 | P17 | DSLWK | LW05P171DSLWK18 | 7/1/2017 | 6/30/2020 | $230,270.00 | 214,118.94 |
| Southwest Human Resource Agency | LW11 | F17 | TFSWA | LW11F171TFSWA17 | 7/1/2018 | 11/14/2018 | $623,350.00 | 66,887.54 |
| Southwest Human Resource Agency | LW11 | F18 | ADULT | LW11F181ADULT18 | 10/1/2017 | 6/30/2020 | $642,262.00 | 446,334.06 |
| Southwest Human Resource Agency | LW11 | F18 | DSLWK | LW11F181DSLWK18 | 10/1/2017 | 6/30/2020 | $626,521.00 | 256,134.75 |
| Southwest Human Resource Agency | LW11 | P16 | MNSWA | LW11P161MNSWA17 | 7/1/2018 | 11/14/2018 | $62,335.00 | 5,702.31 |
| Southwest Human Resource Agency | LW11 | P17 | ADULT | LW11P171ADULT18 | 7/1/2017 | 6/30/2020 | $93,250.00 | 57,310.02 |
| Southwest Human Resource Agency | LW11 | P17 | DSLWK | LW11P171DSLWK18 | 7/1/2017 | 6/30/2020 | $102,373.00 | 25,479.15 |
| Southwest Human Resource Agency | LW11 | P17 | YOUTH | LW11P171YOUTH18 | 4/1/2017 | 6/30/2020 | $709,343.88 | 699,676.77 |
| Southwest Human Resource Agency | LW11 | P18 | YOUTH | LW11P181YOUTH19 | 4/1/2018 | 6/30/2021 | $376,781.00 | 169,318.23 |
| Upper Cumberland Development District | LW07 | F17 | ADSWA | LW07F171ADSWA17 | 7/1/2018 | 6/30/2019 | $110,000.00 | 77,338.41 |
| Upper Cumberland Development District | LW07 | F17 | DWSWA | LW07F171DWSWA17 | 7/1/2018 | 6/30/2019 | $225,000.00 | 41,973.70 |
| Upper Cumberland Development District | LW07 | F17 | MNSWA | LW07F173MNSWA17 | 7/1/2018 | 6/30/2019 | $22,500.00 | 11,690.32 |
| Upper Cumberland Development District | LW07 | F17 | MNSWA | LW07F174MNSWA17 | 7/1/2018 | 6/30/2019 | $11,000.00 | 5,211.93 |
| Upper Cumberland Development District | LW07 | F18 | ADULT | LW07F182ADULT18 | 10/1/2017 | 6/30/2020 | $207,241.86 | 190,882.11 |
| Upper Cumberland Development District | LW07 | F18 | DSLWK | LW07F182DSLWK18 | 10/1/2017 | 6/30/2020 | $339,871.40 | 308,860.25 |
| Upper Cumberland Development District | LW07 | P17 | YOUTH | LW07P172YOUTH18 | 4/1/2017 | 6/30/2020 | $502,374.23 | 285,009.74 |
| Upper Cumberland Development District | LW07 | P17 | DSLWK | LW07P173DSLWK18 | 7/1/2017 | 6/30/2020 | $11,366.00 | 10,505.99 |
| Upper Cumberland Development District | LW07 | P18 | YOUTH | LW07P181YOUTH19 | 4/1/2018 | 6/30/2021 | $403,701.00 | 224,507.34 |
| Walters State Community College | LW02 | P17 | YOUTH | LW02P171YOUTH18 | 4/1/2017 | 6/30/2020 | $1,073,032.00 | 1,048,833.71 |
| Workforce Solutions | LW06 | P17 | ADULT | LW06P172ADULT18 | 7/1/2017 | 6/30/2020 | $291.00 | 291.00 |
| Workforce Solutions | LW06 | P17 | DSLWK | LW06P172DSLWK18 | 7/1/2017 | 6/30/2020 | $14,618.00 | 14,618.00 |
| Workforce Solutions | LW06 | P17 | YOUTH | LW06P172YOUTH18 | 4/1/2017 | 6/30/2020 | $1,894.00 | 1,894.00 |
| Workforce Solutions | LW06 | F17 | TFSWA | LW06F171TFSWA17 | 7/1/2018 | 11/14/2018 | $208,050.00 | 109763.21 |
| Workforce Solutions | LW06 | P17 | ADULT | LW06P171ADULT18 | 7/1/2017 | 6/30/2020 | $57,889.00 | 57889 |
| Workforce Solutions | LW06 | P17 | DSLWK | LW06P171DSLWK18 | 7/1/2017 | 6/30/2020 | $98,373.00 | 98373 |
| Workforce Solutions | LW06 | F18 | ADULT | LW06F181ADULT18 | 10/1/2017 | 6/30/2020 | $398,697.00 | 378994.64 |
| Workforce Solutions | LW06 | F18 | DSLWK | LW06F181DSLWK18 | 10/1/2017 | 6/30/2020 | $602,037.00 | 503420.42 |
| Workforce Solutions | LW06 | P16 | MNSWA | LW06P161MNSWA17 | 7/1/2018 | 11/14/2018 | $20,805.00 | 9076.35 |
| Workforce Solutions | LW06 | P17 | YOUTH | LW06P171YOUTH18 | 4/1/2017 | 6/30/2020 | $434,085.00 | 372339.03 |
| Workforce Solutions | LW06 | P18 | YOUTH | LW06P181YOUTH19 | 4/1/2018 | 6/30/2021 | $170,134.00 | 48538.22 |
| Southeast TN Development District | LW05 | P17 | YOUTH | LW05P171YOUTH18 | 4/1/2017 | 6/30/2019 | $1,401,797.00 | 986249.2 |
| Northwest Tennessee Workforce Board | LW12 | F17 | MNSWA | LW12F172MNSWA17 | 7/1/2017 | 6/30/2018 | $11,500.00 | 11500 |
| Alliance For Business And Training | LW01 | F18 | QSNAP | LW01F181QSNAP18 | 10/1/2017 | 9/30/2018 | $54,108.00 | 48699 |
| Walters State Community College | LW02 | F18 | QSNAP | LW02F181QSNAP18 | 10/1/2017 | 9/30/2018 | $18,537.00 | 16360.51 |
| East Tennessee Human Resource Agency Inc | LW04 | F18 | QSNAP | LW04F181QSNAP18 | 10/1/2017 | 9/30/2018 | $38,000.00 | 34710.42 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Southeast TN Development District | LW05 | F18 | QSNAP | LW05F181QSNAP18 | 10/1/2017 | 9/30/2018 | $33,140.00 | 20400 |
| North Tennessee Workforce Board | LW08 | F18 | QSNAP | LW08F181QSNAP18 | 10/1/2017 | 9/30/2018 | $78,699.00 | 58273.22 |
| Nashville Career Advancement Ctr | LW09 | F18 | QSNAP | LW09F181QSNAP18 | 10/1/2017 | 9/30/2018 | $94,036.00 | 58261.5 |
| South Central Tennessee Workforce Allian | LW10 | F18 | QSNAP | LW10F181QSNAP18 | 10/1/2017 | 9/30/2018 | $12,600.00 | 8261.59 |
| Southwest Human Resource Agency | LW11 | F18 | QSNAP | LW11F181QSNAP18 | 10/1/2017 | 9/30/2018 | $11,943.00 | 321.6 |
| Workforce Solutions | LW06 | F18 | QSNAP | LW06F181QSNAP18 | 10/1/2017 | 9/30/2018 | $5,000.00 | 4999 |
| City of Memphis | LW13 | F18 | QSNAP | LW13F181QSNAP18 | 10/1/2017 | 9/30/2018 | $187,500.00 | 40017.23 |
| Upper Cumberland Development District | LW07 | F18 | QSNAP | LW07F182QSNAP18 | 3/1/2018 | 9/30/2018 | $34,428.00 | 22487.08 |
| The University of Tennessee | LW21 | F18 | QSNAP | LW21F181QSNAP18 | 10/1/2017 | 9/30/2018 | $72,000.00 | 63280.01 |
| The University of Tennessee | LW21 | F18 | SSNAP | LW21F181SSNAP18 | 2/1/2018 | 9/30/2018 | $425,531.00 | 168326.51 |

# Appendix D: Risk Assessment

| Row Labels | Sum of Grant Amount | Risk Assessment Level |
|---|---|---|
| Alliance For Business And Training | $ 4,953,024.00 | High |
| City of Memphis | $ 12,980,620.00 | High |
| East Tennessee Human Resource Agency Inc | $ 7,652,471.00 | High |
| Goodwill Industries - Knoxville, Inc. | $ 274,053.00 | High |
| Knoxville/Knox Co CAC | $ 3,869,767.00 | High |
| Meritan Inc | $ 423,291.00 | High |
| Nashville Career Advancement Ctr | $ 7,224,330.00 | High |
| North Tennessee Workforce Board | $ 8,245,517.85 | High |
| Northwest Tennessee Workforce Board | $ 5,306,617.40 | High |
| Shelby County Government | $ 5,520,107.00 | High |
| South Central Tennessee Development District | $ 1,324,210.00 | High |
| South Central Tennessee Workforce Allian | $ 2,320,351.00 | High |
| Southeast TN Development District | $ 8,693,106.00 | High |
| Southwest Human Resource Agency | $ 4,496,837.88 | High |
| Tennessee Community Services Agency | $ 257,655.00 | High |
| Upper Cumberland Development District | $ 3,708,777.49 | High |
| Walters State Community College | $ 3,753,854.00 | High |
| Workforce Solutions | $ 2,011,873.00 | High |
| The University of Tennessee | $ 497,531.00 | High |
| **Grand Total** | **$ 83,513,993.62** | |

**Per 20 CFR 683.410(b)(2)(i), the State monitoring system must provide for annual on-site monitoring reviews of local areas.**

**Due to the re-alignment of Tennessee's workforce system, all areas have been assigned a high-risk level.**

# Appendix E: Explanation of Previous Cycle Monitoring Findings

| Corrective Action Plan Tracker for Monitoring Cycle 2016-2017 | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | Date Report Issued/Sent | Initial CAP Response from LWDA Received | TDLWD Response Sent | Second Response Received from LWDA | TDLWD Response Sent | Third Response Received from LWDA | Final TDLWD Response Sent | CAP Accepted? |
| **LWDA 1** | 2/27/2018 | 3/19/2018 | | | | | 5/11/2018 | Yes |
| **LWDA 2** | 7/27/2017 | 7/31/2017 | | | | | 9/19/2017 | Yes |
| **LWDA 3** | 12/12/2017 | 1/11/2018 | | | | | 5/11/2018 | Yes |
| **LWDA 4** | 5/18/2018 | 6/11/2018 | 7/20/2018 | 8/16/2018 | | | 8/22/2018 | Yes |
| **LWDA 5** | 4/25/2017 | 5/22/2018 | 6/1/2018 | 7/2/2018 | | | 7/20/2018 | Yes |
| **LWDA 6** | 11/9/2017 | 11/22/2017 | | | | | 3/15/2018 | Yes |
| **LWDA 7** | 2/3/2017 | | | | | | No findings | N/A |
| **LWDA 8** | 7/28/2017 | | | | | | No findings | N/A |
| **LWDA 9** | 10/20/2017 | 11/15/2017 | 4/13/2018 | | | | 10/24/2018 | Yes |
| **LWDA 10** | 1/19/2017 | 2/15/2018 | 3/15/2018 | 4/7/2018 | 5/11/2018 | 6/5/2018 | 7/20/2018 | Yes |
| **LWDA 12** | 5/2/2017 | | | | | | No findings | N/A |
| **LWDA 13** | 5/24/2017 | 2/14/2018 | | | | | 3/15/2018 | Yes |
| **Goodwill Knoxville** | 3/26/2018 | 4/4/2018 | | | | | 5/11/2018 | Yes |
| **Goodwill Middle TN** | 10/31/2017 | 11/6/2017 | | | | | 3/6/2018 | Yes |
| **Advance Memphis** | 11/9/2017 | 9/11/2017 | | | | | 6/1/2018 | Yes |

# Appendix E: Explanation of Previous Cycle Monitoring Findings

| Corrective Action Plan Tracker for Monitoring Cycle 2016-2017 |
|---|
| **LWDA 1** |
| • Questioned costs were charged to contracts. The following deficiencies were noted: sales tax of $6.82 was reimbursed to a participant and billed to LW01F171DSLWK17 and sales tax of $1.08 was reimbursed to agency staff and billed to LW01P151NCSWA16<br>• Expenses were charged to contract prior to contract period. The following deficiencies were noted: participant's expenses incurred in April, May, and June 2016 were charged to contract LW01F161DWRSP16. Contract period for this contract began on July 1, 2016, and ends on June 30, 2017<br>**• Prior to the exit conference, LWDA 1 staff had entered journal entries to correct these questioned costs. The monitoring staff have obtained and reviewe the correcting journal entries.** |
| **LWDA 2** |
| • Agency may not meet the Youth 20% Work Experience requirement, as required by Title I of WIOA. According to the January 2017 Monthly Expenditure Report for grant LW02P151YOUTH16, LWDA 2 may not meet the youth experience expenditure requirement. Report indicates that LWDA 1 only had 10.1% in youth work experience. Grant period is April 1, 2015 through June 30, 2017.<br>**• The assignment of staff to concentrate on developing work experience placements for youth and instructing all career specialists to place youth in work experience will increase the number of youth in these projects. In addition, the involvement of the Youth Committee to resolve this issue and providing recommendations to the Local Board to increase the maximum paid hours may assist in the participation rate.**<br>• Questioned costs were charged to contract LW02P151DSLWK16. A lodging amount charged to the contract in January 2017 exceeded the allowable rate reflected in the State of Tennessee Comprehensive Travel Regulations by $10.49. This is a questioned cost.<br>**•LWDA 2 has reimbursed the travel overage using unrestricted funds.**<br>• Equipment acquisition cost needs updating in the inventory records. Four (4) equipment items had the incorrect contract number or funding source shown in the inventory listing, should have funding source of LW02P151NCWSA16. Nine (9) equipment items had the purchase order amount shown in the inventory listing, as opposed to the acquisition cost. All nine (9) of these items have acquisition dates of Janury 7, 2016.<br>**• LWDA 2 has corrected the funding for the four pieces of equipment and has also corrected the inventory listing of an additional eight pieces of equipment to reflect actual costs instead of estimated amounts.** |
| **LWDA 3** |
| • Questioned costs were charged to contracts: sales tax of $22.46 was reimbursed to a participant and billed to LW03F161DSLWK16 and sales tax of $10.68 was reimbursed to a participant and billed to LW03P161DSLWK17.<br>**• The amounts of $22.46 and $10.68 were moved from their previous accounts to a general account.**<br>• Agency may not meet the Youth 20% Work Experience requirement, as required by Title I of WIOA.<br>**• The finding has been resolved as evidenced by an update to the Title I Youth Program Grant Agreement.**<br>• The federal funding source of purchased equipment needs updating in the inventory records.<br>**• The finding has been resolved as evidenced by the 2015 Active Inventory Disposition Listing.** |
| **LWDA 4** |
| • Expense was charged to contract LW04P161SCSEP17, even though the expense occurred prior to the contract period. The expense for an American Red Cross CPR class attended by participants that occurred on June 6, 2016 was charged to contract LW04P161SCSEP17.<br>**• The State has reviewed contract LW04P151SCSEP16--including all provided attachments--and found that the expense accrued to pay for Red Cross training was correctly charged to the aforementioned contract.**<br>• The required close out report related to LW04P161RESEA17, during the monitoring period, was not submitted in a timely manner...the close out report should have been submitted by May 15, 2017; however, it was submitted on May 18, 2017, which was three (3) days late.<br>**• The State has reviewed the status reports for PY2017-2018 and agrees that reports have been submitted in a timely manner.** |
| **LWDA 5** |

# Appendix E: Explanation of Previous Cycle Monitoring Findings

- When the Southeast Tennessee Development District (SETDD) allocated administrative costs, the costs were not allocated in accordance with the approved plan. The Excel spreadsheet formula did not include all of the expenditures, which resulted in a higher allocation percentage.
- **Per the plan, administrative costs were accumulated in a separate cost pool and the total was allocated to the programs based on the percentage of program salaries (not gross salaries) vs. total direct salaries, applied to total administrative costs.**
- Eleven (11) monthly status reports for May 2017 were submitted twelve (12) days late.
- **Mitigating circumstances that the State found unlikely to be repeated.**

## LWDA 6

- Expenses reported for RESEA contract occurred prior to the contract period
- **The submitted general ledger demonstrates that the questioned cost in the amount of $75.20 was reclassified and removed from contract LW06F171RESEA17 and charged to contract LW06P161RESEA17**
- **The submitted general ledger demonstrates that the quesioned cost in the amount of $161.96 has been reclassified and moved from contract LW06F171RESEA17 and charged to contract LW06P161RESEA17**
- 3 Youth contracts over reported on the monthly expenditure/status report
- **Procedures have been put in place by submitting the general ledger with status reports so that allowable costs reported to the funding source are traceable to accounting records.**
- Agency did not meet the Youth 20% Work Experience Requirement
- **Monthly expenditure reports demonstrate that LWDA has met the required Youth Work Experience Expenditure rate, at 20%.**
- Case management needs improvement
- **TDLWD has reviewed the documentation in Jobs4TN and fonfiend the closure dates for the identified participants has been documented.**

## LWDA 7

PAR did not identify any findings of noncompliance during the monitoring review.

## LWDA 8

PAR did not identify any findings of noncompliance during the monitoring review.

## LWDA 9

- Closeout reports were not submitted timely
- **Implementing additional review by the Local Board in the close-out process will help mitigate or eliminate any such further occurances**
- Federal funding source of purchased equipment needs updating in the inventory records
- **TDLWD has obtained the updated inventory list from PAR as supportive documentation**
- Questioned sales tax reimbursement to participant of $17.61
- **The questioned cost of $17.61 will be settled using a check remitted to the State to reimburse the questioned cost.**

## LWDA 10

- Questioned cost was charged to contract LW10P151NCSWA16: LWDA provided breakfast and lunch for a staff meeting in the amount of $1,040.00. The staff meeting concentrated on employee benefits and there was no evidence that WIOA technical information was provided.
- **A formal agenda for this meeting was submitted. An attendee sign-in sheet was submitted. The disallowed cost of $1,040 was resolved as evidenced by the revised closeout report to contract LW10P151NCSWA16 which includes a check for the disallowed cost**
- Case management needs improvement. Based on the examination of a sample of 20 adult participants, 20 dislocated worker participants, and 20 youth participants: activity information was not updated in VOS, appropriate follow-up was not completed, three (3) dislocated worker and one (1) adult participants' files did not have EO/grievance and complaint statement, and one (1) adult participant's file did not have sufficient case notes to determine progress in the program
- **The State has reviewed each participant file listed above. TDLWD staff has confirmed the file has had an activity closure date entered into VOS.**
- **The State has reviewed each participant file listed above. Follow-up tables and updated case notes were included. The files are now compliant under WIOA.**
- **The State has reviewed the participant files and found that the appropriate documentation was either uploaded or due diligence in attempts to retrieve this documentation (demonstrated by email correspondence) has been made.**
- **The State has reviewed the file and found case notes to be satisfactory.**
- Agency did not meet the Youth 20% Work Experience requirement, as required by WIOA.
- **The TDLWD realizes that the youth expenditure rate cannot be changed as this grant is in the past, however the State has reviewed the current grant and concurs that progress is satisfactory in meeting the youth work experience expenditure requirement.**

# Appendix E: Explanation of Previous Cycle Monitoring Findings

| LWDA 12 |
| --- |
| PAR did not identify any findings of noncompliance during the monitoring review. |
| **LWDA 13** |
| • On the Job Training (OJT) wages for three (3) participants were charged to contract LW13F151ADULT15, even though the wages were earned prior to the contract period<br>• **Enteries were made to remove the questioned cost**<br>• Questioned costs were charged to contract LW13P141YOUTH15<br>• **Entries were made to remove the questioned cost**<br>• Equipment funding source needs to be updated in the inventory record<br>• **Equipment funding source has been updated** |
| **Goodwill Industries Knoxville** |
| • Due to co-mingling of accounts, reported expenditure amounts could not be reconciled with general ledger.<br>• **Entries were made to remove questioned costs**<br>• Goodwill Knoxville did not requrest or receive approval for the purchase of equipment, prior to the purchase of the equipment.<br>• **Inventory process has been revised and quarterly updates are occuring regularly** |
| **Goodwill Industries Middle TN** |
| • Closeout report was not submitted timely<br>• **Prior approval was granted resulting in the cited noncompliance** |
| **Advance Memphis** |
| • Four (4) program participants were not eligible for SNAP benefits, which resulted in $1,509.00 in questioned costs. Advance Memphis utilized three (3) different programs to provide services and the case management records maintained by Advance Memphis indicatd the provided services.<br>• **Entries were made to remove questioned costs**<br>• Mileage was reimbursed at a rate that was higher ($0.51 per mile) than the State's travel reimbursement schedule ($0.47 per mile), which resulted in questioned costs of $18.70.<br>• **Entries were made to remove questioned costs** |

# Appendix F

## LWDB/AJC System Questionnaire-WIOA Duties and Controls Review for LWDA _____

## I. Local Governance:

a. Interlocal Agreements are in place and executed ☐Yes ☐No

b. Partnership Agreements are in place and executed ☐Yes ☐No

c. Board roster compliant with WIOA composition standards ☐Yes ☐No

d. Did the LWDB hire a director and other staff to assist in carrying out the functions of the Local Board? **(PAR REVIEW ON SITE)** ☐Yes ☐No

1. If yes, is the board a 501c and are employees/staff hired direct? **(PAR REVIEW ON SITE)**
☐Yes ☐No
2. If yes, has the LWDB established and applied a set of qualifications for the position of director that ensure the individual selected has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in carrying out the functions of the Local Board? ☐Yes ☐No
**(PAR MUST VERIFY BY REVIEWING THE DOCUMENT APPROVED BY LWDB)**

e. Do Local Board staff assist the Local Board in any capacity other than to fulfill the required functions of WIOA Section 107(d)? **(PAR REVIEW ON SITE)** ☐Yes ☐No

f. Did the LWDB select an entity to staff the Local Board that provides additional workforce functions beyond the functions described in WIOA Section 107(d)? **(PAR REVIEW ON SITE)** ☐Yes ☐No

1. If an entity that provides additional workforce functions beyond the functions described at WIOA Section 107(d) is serving as staff to the board, has the board and entity executed an agreement as required and outlined in 20 CFR 679.430 that clarifies their roles and responsibilities? **(LWDB ANSWERS, PAR VERIFIES)**
☐Yes ☐No

2. Is this agreement separate from the Interlocal and Partnership Agreements?

**(LWDB ANSWERS, PAR VERIFIES)** ☐Yes ☐No

g. Have the CLEO and Fiscal Agent executed a contract/MOU clearly outlining the Fiscal Agent's roles and responsibilities? **(LWDB ANSWERS, PAR VERIFIES)**

☐Yes ☐No

## II. Firewall Provisions:

a. Board staff are properly separated from the delivery of services (with the exception of business services, which may be delivered by LWDB or a combination of LWDB and contracted provider. **(LWDB ANSWERS, PAR VERIFIES)**

☐Yes ☐No

b. Is the OSO clearly the functional manager of the AJC? **(LWDB ANSWERS, PAR VERIFIES)**

☐Yes ☐No

c. If the OSO's entity is also the provider of career services, there are clear firewalls and separations of duties in place between OSO function staff and career service staff. **(LWDB ANSWERS, PAR VERIFIES)** ☐Yes ☐No ☐N/A

d. Contracts or MOU are in place that clearly outline the delivery of business services between Board staff and service provider. **(LWDB ANSWERS, PAR VERIFIES)**

☐Yes ☐No

e. Is Board staff physically located in any of the AJC sites? **(LWDB ANSWERS, PAR VERIFIES)**

☐Yes ☐No

## III. Career Services:

a. Are at least two staff present at all times to meet the scheduling requirements for the mobile American Job Center? ☐Yes ☐No
**(LWDB ANSWERS, PAR VERIFIES)**

b. Please answer the following questions for the front desk/check in process.
**(LWDB ANSWERS, PAR VERIFIES)**

- Is the priority of service process for veterans and eligible spouses being observed during check-in? ☐Yes ☐No
- Is there a process for initial intake being conducted by the intake unit?

☐Yes ☐No

- Are appropriate referrals to partner staff occurring during intake?

☐Yes ☐No

- Is the VOS greeter being utilized to count traffic to the center?

☐Yes ☐No

c. Is "Meaningful UI Assistance" provided in the comprehensive and affiliate sites?

☐Yes ☐No

**(LWDB ANSWERS, PAR VERIFIES)**

*Meaningful Assistance is defined in 20 CFR 678.430 as:*

- *Providing assistance by phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time.*
- *The Combined State plan for Tennessee states that assistance with a UI claim will be provided utilizing Zendesk and Zoprim chat.*

d. Is there a referral process as outlined in TEGL 16:16 for both internal and external partners? **(LWDB ANSWERS, PAR VERIFIES)**

*Section 8 of the MOU-IFA guidance states:*

*"Parties to the MOU must provide specifics in the One-Stop Service Delivery MOU detailing how Partners will refer individuals to appropriate services and activities and receive feedback on the outcome of the referral." An example of a referral process with an external partner would include a form (electronic or paper) that is filled out regarding the needs of the customer, which is then scanned and emailed to the external partner. This form would include a section for the external partner to fill out and return indicating the steps taken with the participant.*

## IV. Fiscal:

a. The LWDB developed a budget? **(LWDB ANSWERS, PAR VERIFIES – PAR MUST SEE DOCUMENT)**

☐Yes ☐No

b. Are mechanisms are in place to track the 40% minimum participant cost rate?

☐Yes ☐No

c. Are mechanisms are in place to track the 80% obligation rate?

☐Yes ☐No

d. Are required fiscal reports submitted timely?

☐Yes ☐No

**(LWDB ANSWERS, PAR VERIFIES – PAR MUST SEE DOCUMENT)**

## V. Monitoring:

a. Are the AJCs adequately staffed? **(LWDB ANSWERS THIS AND FOLLOWING TWO QUESTIONS, PAR VERIFIES)** ☐Yes ☐No

1. How many staff are OSO? How many are career services?

2. How many are staff to the Board?

b. Has the LWDB established a formal monitoring plan and guide, including criteria to evaluate One-Stop Operator performance? ☐Yes ☐No
**(LWDBS MUST HAVE THIS DOCUMENT: MUST BE SUBMITTED TO TDLWD AND AVAILABLE AT AJC LOCATION FOR ON-SITE REVIEW BY PAR)**

1. Is this process conducted at least annually? ☐Yes ☐No
**(LWDB ANSWERS, PAR VERIFIES)**

c. Is the OSO monitoring and executing the agreements with partners as outlined in the LWDA's MOU? **(LWDB ANSWERS, PAR VERIFIES)** ☐Yes ☐No

d. Is the OSO reporting to the LWDB and their staff (board staff) on operations, performance, and continuous improvement recommendations? ☐Yes ☐No
**(LWDB ANSWERS, PAR VERIFIES – PAR MUST SEE DOCUMENT)**

e. Is the monitoring process formalized and reported during LWDB meetings, to the CLEO, and to TDLWD? **(LWDB ANSWERS, PAR VERIFIES)** ☐Yes ☐No

f. Has the local AJC complaint log been regularly submitted to TDLWD, Compliance and Policy unit, for review? ☐Yes ☐No
**(LWDB ANSWERS, PAR VERIFIES)**

## VI. Businesses Services Team (BST):

a. Is a training mechanism in place—including continued training—to ensure that partner staff understands how to input employer activities in VOS? ☐Yes ☐No
**(LWDB ANSWERS, PAR VERIFIES)**

## VII. Youth Services:

Were youth services allocated through TDLWD under WIOA section 128(b) contracted out to eligible youth service providers? **(LWDB ANSWERS, PAR VERIFIES)**
☐Yes ☐No

## VIII. RESEA:

a. Are RESEA services provided through contracted service providers?
**(LWDB ANSWERS, PAR VERIFIES)** ☐Yes ☐No

b. Is there a local process for referring and co-enrolling RESEA participants into WIOA?

☐Yes ☐No

**(LWDB ANSWERS, PAR RECORDS RESPONSE AND RESEA STAFF VERIFIES ACCURACY)**

c. Were fifty percent (50%) of RESEA participants referred to Title I services?

☐Yes ☐No

**(LWDB ANSWERS, PAR RECORDS RESPONSE AND RESEA STAFF VERIFIES ACCURACY)**

d. Were twenty-five percent (25%) of the RESEA referred participants co-enrolled in Title I services? ☐Yes ☐No

**(LWDB ANSWERS, PAR RECORDS RESPONSE AND RESEA STAFF VERIFIES ACCURACY)**

## IX. SNAP E&T:

a. Is there a process for referring and co-enrolling SNAP E&T participants into WIOA?

☐Yes ☐No

**(LWDB ANSWERS, PAR RECORDS RESPONSE AND SNAP STAFF VERIFIES ACCURACY)**

## X. SCSEP:

a. Are SCSEP services provided through contracted service providers?

**(LWDB ANSWERS, PAR VERIFIES)** ☐Yes ☐No

## XI. Additional Information:

Provide an organizational chart for the One-Stop Operator and Career Service Provider.

Provide an organizational chart for the fiscal agent and staff to the LWDB.

# Appendix G: Program Monitoring Guides

## Adult/Dislocated Worker Monitoring Guide

| Part A. Program Eligibility | Documentation Uploaded | | | |
|---|---|---|---|---|
| (Documents Tab) (Attachment A for reference) | Yes | No | N/A | Comments: Issues and/or Concerns |
| **State ID:** | | | | |
| **Birth Date/Age** | | | | |
| **Social Security Number** | | | | |
| **Citizenship Status** | | | | |
| **Selective Service** | | | | |
| **Veteran Documentation** | | | | |
| **Disability** | | | | |
| **Educational Status at Participation:**<br>□ In School; Post-Secondary<br>□ Not attending school or Secondary School Dropout<br>□ Not attending school; Secondary school graduate or has a recognized equivalent<br>□ Not attending school; within age of compulsory school attendance | | | | |
| **Employment Status at Participation:**<br>□ Employed<br>□ Unemployed<br>□ Under employed<br>□ Long-term Unemployed (27 consecutive weeks or more)<br>□ Employed, but received notice of termination of employment or military separation | | | | |
| **Low Income Individual**<br>Family Size _____<br>Annualized Income $_____ | | | | |
| □ SNAP | | | | |
| □ TANF | | | | |
| □ Other Public Assistance | | | | |
| □ SSI/SSDI | | | | |
| □ Homeless | | | | |
| □ Displaced Homemaker | | | | |
| **Priority of Service** | | | | |
| □ Basic Skills Deficient | | | | |
| □ Foster Youth | | | | |
| **Dislocated Worker** | | | | |
| □ Date of Dislocation | Date: ___/___/____ | | | |
| □ Category: _____ (See attachment A for list of categories and descriptions.) | | | | |
| **Signed Documents:**<br>□ WIOA VOS Application<br>□ IEP/ISS<br>□ OAS<br>□ Waivers (Grievance and EO along with local waivers) | Date: ___/ ___/ ____ | | | |

| IEP/OAS (Plan Tab) | | | | |
|---|---|---|---|---|
| Goals/Objectives **listed** IEP | | | | |
| **Part B. Program Activity** | **Documentation Uploaded/ Action Completed** | | | |
| **(Programs Tab)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| **Application Date** ___/___/___<br>**Participation Date** ___/___/___ | | | | |
| **Co-enrolled in Partner Program** | | | | |
| **Activities in good standing?** (I.e. actual begin date entered, no system closed, etc.) | | | | |
| **Initial Assessment/Test Results** | | | | |
| **Occupational Skills Training (ITA) (20 CFR Subpart C)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| **Activity Code Entered: ____**<br>(See attachment B) | | | | |
| **Acceptance Letter w/ dates uploaded** (meets the LWB time allotment) | | | | |
| **Cost Sheet from ETP uploaded** (meets the LWB cost limitation) | | | | |
| **Activity dates match contract dates** | | | | |
| **Receiving Pell Grant** | | | | |
| **Attendance Records uploaded** | | | | |
| **Grades / Case notes indicating progress of participant** | | | | |
| **Activity Exit Status**<br>□ Successful Completion<br>□ Currently enrolled<br>□ Unsuccessful Completion<br>□ Dropped Out of Activity<br>□ Voided | | | | |
| **Measureable Skills Gain entered** | | | | |
| **Credential uploaded** | | | | |
| **Credential entered** | | | | |
| **On-the-Job Training (OJT) (20 CFR §680.700 - §680.730)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| **Activity Code Entered: ____**<br>(See attachment B) | | | | |
| **OJT contract present** | | | | |
| **Training Outline present** | | | | |
| **Attendance Records uploaded** | | | | |
| **Number of hours worked documented** | | | | |
| **Activity Exit Status**<br>□ Successful Completion<br>□ Currently enrolled<br>□ Unsuccessful Completion<br>□ Dropped Out of Activity<br>□ Voided | | | | |
| **Participant retained beyond end of OJT** | | | | |

| Work Experience / Apprenticeship (20 CFR §680.180) | Yes | No | N/A | Comments: Issues and/or Concerns |
|---|---|---|---|---|
| **Activity Code Entered: _____** (See attachment B) | Actual Begin Date: ___/ ___/ ____ | | | |
| **Timesheets** | | | | |
| **Attendance Records uploaded** | | | | |
| **Payment Requests/ Invoices / Vouchers** | | | | |
| | | | | |
| **Supportive Service Activities (20 CFR §680.900 - §680.920)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| **Activity Codes Entered: _____** (See attachment B) | | | | |
| **Justification for Supportive Services** (i.e. participating in training/employment activity; In an activity above) | | | | |
| **Distribution of Supp. Services uploaded** (supportive service with participant signature and date) | | | | |
| **Payment Request/ Invoices/ Vouchers** | | | | |
| **Attendance Records** | | | | |
| **Supportive services in accordance with local policy** | | | | |
| | | | | |
| **Exit/Follow-Up Information (TEGL 10-16)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| **Closure Date (last day of service)** | Date: ___/ ___/ ____ | | | |
| **Educational Status at Exit:**<br>□ In School; Post-Secondary<br>□ Not attending school or Secondary School Dropout<br>□ Not attending school; Secondary school graduate or has a recognized equivalent | | | | |
| **Entered Employment** | | | | |
| □ Verification present (case noted/uploaded) | | | | |
| **Entered Post-Secondary** | | | | |
| □ Verification present (case noted/uploaded) | | | | |
| **Follow-Up Services Provided** | | | | |
| **Follow-Up Activity Entered** | | | | |
| **Follow-Up Quarters completed to date** | | | | |
| | | | | |
| **Case Notes adequate to follow participant's progress throughout services** | | | | |
| | | | | |

| Recommendations/Findings or area of concern: |
| --- |
| |

# Youth Monitoring Guide

| Part A. Program Eligibility | Documentation Uploaded | | | |
|---|---|---|---|---|
| (Documents Tab) (Attachment A for reference) | Yes | No | N/A | Comments: Issues and/or Concerns |
| **State ID:** | | | | |
| **Birth Date/Age** | | | | |
| **Social Security Number** | | | | |
| **Citizenship Status** | | | | |
| **Selective Service** | | | | |
| **Veteran Documentation** | | | | |
| **Disability** | | | | |
| **Educational Status at Participation:**<br>☐ In School; Secondary or less<br>☐ In School; Alternative School<br>☐ In School; Post-Secondary<br>☐ Not attending school or Secondary School Dropout<br>☐ Not attending school; Secondary school graduate or has a recognized equivalent<br>☐ Not attending school; within age of compulsory school attendance | | | | |
| **Employment Status at Participation:**<br>☐ Employed<br>☐ Unemployed<br>☐ Under employed<br>☐ Long-term Unemployed (27 consecutive weeks or more) | | | | |
| **Low Income Individual**<br>Family Size _____<br>Annualized Income $_____ | | | | |
| ☐ SNAP | | | | |
| ☐ TANF | | | | |
| ☐ Other Public Assistance | | | | |
| ☐ SSI/SSDI | | | | |
| ☐ High Poverty Area | | | | |
| ☐ Free or Reduced Lunch | | | | |
| **Barrier(s) Identified** | | | | |
| ☐ Basic Skills Deficient | | | | |
| ☐ Homeless | | | | |
| ☐ English Language Learner | | | | |
| ☐ Foster Care | | | | |
| ☐ An Offender | | | | |
| ☐ Pregnant/Parenting | | | | |
| ☐ Individual with a Disability | | | | |
| ☐ School Dropout | | | | |
| ☐ Within Compulsory School Attendance but has not attended for most recent calendar year | | | | |
| ☐ Requires Additional Assistance (in accordance with local policy) | | | | |
| **Signed Documents:**<br>☐ WIOA VOS Application<br>☐ IEP/ISS<br>☐ OAS<br>☐ Waivers (Grievance and EO along with local waivers) | Date: ___/ ___/ ____ | | | |

| IEP/OAS (Plan Tab) | | | | |
|---|---|---|---|---|
| Youth Goals/Objectives **listed** IEP | | | | |
| **Part B. Program Activity** | **Documentation Uploaded/ Action Completed** | | | |
| **(Programs Tab)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Application Date ____/____/____<br>Participation Date ____/____/____ | | | | |
| Co-enrolled in Partner Program | | | | |
| Assigned to a Case Manager? | | | | |
| Activities in good standing? (i.e. actual begin date entered, no system closed, etc.) | | | | |
| Participating in a 14 element activity | | | | |
| | **Documentation Uploaded/Action Completed** | | | |
| **Occupational Skills Training (ITA) (20 CFR §681.540)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Activity Code Entered: _____<br>(See attachment B) | | | | |
| Acceptance Letter w/ dates uploaded | | | | |
| Cost Sheet from ETP uploaded | | | | |
| Activity dates match contract dates | | | | |
| Attendance Records uploaded | | | | |
| Grades / Case notes indicating progress of participant | | | | |
| Activity Exit Status<br>☐ Successful Completion<br>☐ Currently enrolled<br>☐ Unsuccessful Completion<br>☐ Dropped Out of Activity<br>☐ Voided | | | | |
| Benchmark entered (capture performance at progress report periods of training) | | | | |
| Measureable Skills Gain entered | | | | |
| Credential entered | | | | |
| Credential uploaded | | | | |
| **Work Experience / Pre-Apprenticeship (20 CFR §681.480; §681.600; §681.620)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Activity Code Entered: _____<br>(See attachment B) | Actual Begin Date:<br>___/ ___/ ____ | | | |
| Timesheets | | | | |
| Attendance Records uploaded | | | | |
| Payment Requests/ Invoices / Vouchers | | | | |
| | | | | |
| **Supportive Service Activities (20 CFR §681.570)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Activity Code Entered: _____<br>(See attachment B) | | | | |
| Justification for Supportive Services<br>(i.e. participating in training/employment activity; In an activity above) | | | | |
| Distribution of Supp. Services uploaded<br>(supportive service with participant signature and date) | | | | |
| Payment Request/ Invoices/ Vouchers | | | | |
| Attendance Records | | | | |

| | | | | |
|---|---|---|---|---|
| Supportive services in accordance with local policy | | | | |
| **Incentive/Bonus Activities (20 CFR §681.640)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Activity Code Entered: _____ (See attachment B) | | | | |
| Case note detailing what incentive is awarded for | | | | |
| Justification for Incentive (i.e. tied to established goals, training/employment activity) | | | | |
| Distribution of Incentive uploaded (supportive service with participant signature and date) | | | | |
| Payment Request / Invoices | | | | |
| Attendance Records | | | | |
| Incentive services in accordance with local policy | | | | |
| | | | | |
| | **Documentation Uploaded/Action Completed** | | | |
| **Exit/Follow-Up Information (20 CFR §681.580)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Closure Date (last day of service) | Date: ___/ ___/ ____ | | | |
| **Educational Status at Exit:**<br>□ In School; Secondary or less<br>□ In School; Alternative School<br>□ In School; Post-Secondary<br>□ Not attending school or Secondary School Dropout<br>□ Not attending school; Secondary school graduate or has a recognized equivalent | | | | |
| **Entered Employment** | | | | |
| □ Verification present (case noted/uploaded) | | | | |
| **Entered Post-Secondary** | | | | |
| □ Verification present (case noted/uploaded) | | | | |
| | | | | |
| **Follow-Up Services Provided** | | | | |
| Follow-Up Activity Entered | | | | |
| Follow-Up Quarters completed to date | | | | |
| | | | | |
| Case Notes adequate to follow participant's progress throughout services | | | | |
| | | | | |
| **Recommendations/Findings or area of concern:** | | | | |

# SCSEP Monitoring Guide

| Part A. Program Eligibility | Documentation Uploaded | | | |
|---|---|---|---|---|
| (Documents Tab) (Attachment A for reference) 20 CFR Part 641.100 | Yes | No | N/A | Comments: Issues and/or Concerns |
| **State ID:** | | | | |
| **Birth Date/Age** | | | | |
| **Social Security Number** | | | | |
| **Citizenship Status** | | | | |
| **Selective Service** | | | | |
| **Veteran Documentation** | | | | |
| **Disability** | | | | |
| **Proof of TN Residency** | | | | |
| **Participant registered at AJC prior to enrollment.** | | | | |
| **Income Status**<br>□ Not more than 125% of Federal Poverty Guidelines<br>□ Income Eligibility Recertified at least Every 12 months | | | | |
| **Employment Status and Job Search**<br>□ Statement of Non-Employment<br>□ Job Search Assistance Provided<br>□ Use of AJC System and Referrals<br>□ Documentation of Job Searches | | | | |
| **Required Documentation: 614.302(c)** | | | | |
| □ Initial Assessment | | | | |
| □ Annual Assessment | | | | |
| □ Family Size Certification Form | | | | |
| □ Participant Training Description | | | | |
| □ Progress Agreements | | | | |
| □ Documentation of Training Hours | | | | |
| □ Return to Work Documentation | | | | |
| □ Request for Leave of Absence | | | | |
| □ Evidence that the assessment results were used to determine the most suitable assignment | | | | |
| □ Alternative assignments were considered if it was determined that alternate host agency would provide greater opportunity. | | | | |
| **Signed Documents:**<br>□ WIOA VOS Application<br>□ Progress agreements between participant and project present<br>□ Progress of participant evaluated and commented every 6 months<br>□ Signatures of both participant and host agency are on each time sheet.<br>□ Documented copies of agenda and sign-in sheets for required quarterly meetings are present<br>□ Confidential Statement of Income<br>□ SCSEP Participant Form<br>□ IEP<br>□ Orientation Training Checklist<br>□ SCSEP Privacy Act Statement | | | | |

| | | | | |
|---|---|---|---|---|
| ☐ Participant Rights and Responsibilities<br>☐ Record for Offer of Physical Examination<br>☐ Participant Task Form<br>☐ Participant and Project Agreement | | | | |
| **IEP (Plan Tab)** | | | | |
| Goals/Objectives **listed** IEP | | | | |
| **Part B. Program Activity** | **Documentation Uploaded/ Action Completed** | | | |
| **(Programs Tab)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Application Date ____/____/____<br>Participation Date ____/____/____ | | | | |
| Assigned to a Case Manager? | | | | |
| Activities in good standing? (i.e. actual begin date entered, no system closed, etc.) | | | | |
| | **Documentation Uploaded/Action Completed** | | | |
| **Assessments/Individual Employment Plan 20 CFR 641.535** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Skills/Attributes/Work History Assessment | | | | |
| Change in Occupational Goal Assessment | | | | |
| Transitional Assessment | | | | |
| Two Assessments per 12 month period | | | | |
| Computer Literacy Assessment | | | | |
| Waiver Activity entered | | | | |
| IEP documenting assessment and job related goal completed within the first month of enrollment date - initial goal is unsubsidized employment | | | | |
| IEP is updated at least as frequently as assessments occur | | | | |
| IEP is modified as necessary to reflect other approaches to self-sufficiency if it became clear that unsubsidized employment is not feasible | | | | |
| IEP contains specific goals and completion dates | | | | |
| IEP follow-up/review is present | | | | |
| Provision in IEP to transition to other services if participant has reached individual durational limit or will not otherwise achieve subsidized employment | | | | |
| Progress review dates are noted in IEP | | | | |
| Is the sub-grantee using the IEP to determine when it is appropriate to rotate participant through assignments, with the goal of achieving unsubsidized | | | | |

| | | | | |
|---|---|---|---|---|
| employment<br>Participant is receiving training on job seeking skills - indicate the date the training was provided in the comments section | | | | |
| Training is part of the IEP and case notes | | | | |
| Training records kept in accordance with TDLWD/SCSEP policy | | | | |
| Can the sub-grantee produce documentation of training hours? | | | | |
| **Supportive Services 20CFR 641.540** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Receiving Supportive Services | | | | |
| Services are At No Cost or Reduced Cost | | | | |
| Job Search Activity Verification | | | | |
| Receipts for Travel, Lodging, Meals | | | | |
| Referrals made to formal assessments and partner agencies if needed | | | | |
| Follow-up being conducted with the participant within the first 6 months to determine if supportive services are needed to maintain training | | | | |
| **Orientation/training 20 CFR 641.535** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Documentation of participant attendance at one workshop training per quarter | | | | |
| Evidence that SCSEP orientation was provided at the time of enrollment or prior to the first day at a host agency and compensated | | | | |
| **Documentation Uploaded/Action Completed** | | | | |

| **Exit/Follow-Up Information** | **Yes** | | | **No** | **N/A** |
|---|---|---|---|---|---|
| Exit Date | Date: ___/___/____ | | | | |
| Active no longer than 48 months | | | | | |
| Exit Form | | | | | |
| □ Verification present (case note) | | | | | |
| Documentation that follow-up is being conducted on participant if obtained unsubsidized employment | | | | | |
| Proper documentation when termination for cause present | | | | | |
| Participant was provided a 30 day written notice that includes the reason for any ineligibility determination | | | | | |
| **Follow-Up Services Provided** | | | | | |

| | | | | |
|---|---|---|---|---|
| Follow-Up Activity Entered | | | | |
| Follow-Up Quarters completed to date | | | | |
| Case Notes adequate to follow participant's progress throughout services | | | | |
| **Recommendations/Findings or area of concern:** | | | | |

# TAA Monitoring Guide

| **Part A. Program Eligibility**<br>**(20 CFR 617 Subpart C – Reemployment Services; TEGL 11-02, 22-08, 10-11, 5-15)** | **Documentation Uploaded** | | | |
|---|---|---|---|---|
| **(Documents Tab) (Attachment A for reference)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| **State ID:** | | | | |
| **Birth Date/Age** | | | | |
| **Social Security Number** | | | | |
| **Citizenship Status** | | | | |
| **Selective Service** | | | | |
| **Veteran Documentation** | | | | |
| **Disability** | | | | |
| **Petition Number** | | | | |
| **Educational Status at Participation:**<br>□ High School Graduate<br>□ Past Credentials Obtained<br>□ Copy of Past Credential uploaded | | | | |
| **Employment Status and Job Search**<br>□ TAA Eligibility Documentation<br>□ Resume uploaded<br>□ Virtual Recruiter Completed<br>□ Job Search Conducted | | | | |
| **Training Outline and Documentation** | | | | |
| □ Dates Verified/School Calendar | | | | |
| □ Academic Plan | | | | |
| □ Program Cost Sheet | | | | |
| □ Signature of Authority | | | | |
| □ School Cost Comparison | | | | |
| □ Mileage Documentation | | | | |
| □ Supply and Demand | | | | |
| □ Placement Rating | | | | |
| □ Cost Sheet per Term | | | | |
| □ TABE/CASAS Scores | | | | |
| **Signed Documents:**<br>□ WIOA VOS Application<br>□ TAA Application<br>□ TAA Determination and Enrollment form<br>□ IEP<br>□ Training Financial Support Statement<br>□ Training Agreement and Responsibilities<br>□ Willing to Commute<br>□ W-9<br>□ Wagner-Peyser Application | Date: ___/ ___/ ____ | | | |
| **IEP (Plan Tab)** | | | | |
| Goals/Objectives **listed** IEP | | | | |
| **Part B. Program Activity** | **Documentation Uploaded/ Action Completed** | | | |
| **(Programs Tab)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Application Date ____/____/____<br>Participation Date ____/____/____ | | | | |

| | | | | |
|---|---|---|---|---|
| Co-enrolled in Title I? | | | | |
| Assigned to a Case Manager? | | | | |
| Activities in good standing? (i.e. actual begin date entered, no system closed, etc.) | | | | |
| | **Documentation Uploaded/Action Completed** | | | |
| **Training** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Training Activity Code Entered: _____ | | | | |
| Bona-fide Date | | | | |
| Cost Sheet from ETP uploaded | | | | |
| Activity dates match actual training dates | | | | |
| Attendance Records uploaded | | | | |
| Grades / Case notes indicating progress of participant | | | | |
| Activity Exit Status<br>☐ Successful Completion<br>☐ Currently enrolled<br>☐ Unsuccessful Completion<br>☐ Dropped Out of Activity<br>☐ Voided | | | | |
| Benchmarks entered every 60 days (capture performance at progress report periods of training) | | | | |
| Measureable Skills Gain entered | | | | |
| Credential entered | | | | |
| Credential uploaded | | | | |
| **ATAA/RTAA (TEGL 22-08, 10-11, 5-15)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Wage Subsidy Activity entered | Actual Begin Date: ___/ ___/ ____ | | | |
| Request for RTAA in file | | | | |
| Last Check Stub from Previous Employer | | | | |
| First Check Stub from New Employer | | | | |
| Request for Reemployment Data | | | | |
| Waiver Completed/Updated if applicable | | | | |
| Waiver Activity entered | | | | |
| **Job Search Allowance (20 CFR 617 Subpart D—Job Search Allowances; TEGL 11-02, 22-08, 10-11, 5-15)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Activity Code Entered: _____ | | | | |
| Job Search Allowance Application | | | | |
| Job Search Activity Verification | | | | |
| Receipts for Travel, Lodging, Meals | | | | |
| 3 Sources of Mileage Verification | | | | |
| **Relocation (20 CFR 617 Subpart E—Relocation Allowances ; TEGL 11-02, 22-08, 10-11, 5-15)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Activity Code Entered: _____ | | | | |
| Request for Relocation Assistance | | | | |
| Relocation Approval Packet | | | | |
| 3 Estimates for Moving Expenses | | | | |
| 3 Sources of Mileage Verification | | | | |

| Receipts of Incurred Costs | | | | |
|---|---|---|---|---|
| | **Documentation Uploaded/Action Completed** | | | |
| **Exit/Follow-Up Information (20 CFR §681.580)** | **Yes** | **No** | **N/A** | **Comments: Issues and/or Concerns** |
| Closure Date (last day of service) | Date: ___/ ___/ ____ | | | |
| **Entered Employment** | | | | |
| □ Verification present (case note) | | | | |
| **Follow-Up Services Provided** | | | | |
| Follow-Up Activity Entered | | | | |
| Follow-Up Quarters completed to date | | | | |
| Case Notes adequate to follow participant's progress throughout services | | | | |
| **Recommendations/Findings or area of concern:** | | | | |

# RESEA Monitoring Guide

| Part A. Program Eligibility | Documentation Uploaded | | | |
|---|---|---|---|---|
| | Yes | No | N/A | Comments: Issues and/or Concerns |
| **State ID:** | | | | |
| **Name:** | | | | |
| **Activities:**<br>□ Either 592 or 593 activity is present dated same as the orientation date<br>□ 211 activity is present if referred to Title I per case notes (19R should be present if after April 2018)<br>□ 210 activity is present if participant does not have a high school diploma<br>□ 194 activity present if claimant is exempt<br>□ 193 activity present if claimant gained employment<br>□ 192 activity is present if claimant missed a meeting<br>□ 19B activity is present if claimant refused services<br>□ 19A activity is present if claimant attended a meeting after they were assigned a 192 activity<br>□ 198 activity is present if RESEA program has been completed<br>□ Activities associated with RESEA have not been duplicated by staff at the AJC | | | | |
| **Documentation:**<br>□ Resume is present if claimant completed the program<br>□ If exempt, proper documentation present<br>□ All documentation is uploaded for orientation visit<br>□ All documentation is uploaded for subsequent return<br>□ Eligibility review documentation is present if claimant indicated a potential eligibility issue<br>□ Documents are uploaded using the appropriate naming format<br>*See below for proper documentation* | | | | |
| **EDPs and Case Notes:**<br>□ Goals and Action Steps are clearly outlined<br>□ Proper Case notes | | | | |
| **Recommendations/Findings or area of concern:** | | | | |

# Appendix H: Equal Employment Opportunity Questionnaire

## Monitoring Tool: Equal Employment Opportunity

| **Subrecipient:**<br>**Date:**<br>**Completed By:**<br>**Review Date:**<br>**TDLWD Monitor:** | | | | |
|---|---|---|---|---|
| Has the Local Workforce Development Area (LWDA) appointed its equal opportunity officer for WIOA Title I services? | ☐Yes | ☐No | ☐N/A | Comments: |
| Has the LWDA provided reasonable accommodations for persons with disability? If not, see below. | ☐Yes | ☐No | ☐N/A | Comments: |
| Does the LWDA provide initial and continuing notice (using the required nondiscrimination language) that it does not discriminate on any prohibited grounds? | ☐Yes | ☐No | ☐N/A | Comments: |

| **Does the LWDA publish or broadcast program information in the news media? If so, does the LWDA indicate in the publications and broadcasts that:** | | | | |
|---|---|---|---|---|
| The WIOA funded program or activity in question is an equal opportunity employer/program? | ☐Yes | ☐No | ☐N/A | Comments: |
| Auxiliary aids and services are available upon request to individuals with disabilities? | ☐Yes | ☐No | ☐N/A | Comments: |

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# Monitoring Tool: Equal Employment Opportunity

| | | | | |
|---|---|---|---|---|
| Has the LWDA applied analysis to its programs in order to determine how best to deliver language assistance to individuals who are Limited English Proficient (LEP)? | ☐Yes | ☐No | ☐N/A | Comments: |

| **If the analysis indicates the need for language assistance services, does the LWDA have in place one or more of the following oral interpretation services:** | | | | |
|---|---|---|---|---|
| Bi-lingual staff? | ☐Yes | ☐No | ☐N/A | |
| Staff interpreters? | ☐Yes | ☐No | ☐N/A | |
| Contract interpreters? | ☐Yes | ☐No | ☐N/A | |
| Telephone interpretation? | ☐Yes | ☐No | ☐N/A | |

| | | | | |
|---|---|---|---|---|
| Do the LWDA's written translation procedures fall within the "Safe Harbor" provisions? | ☐Yes | ☐No | ☐N/A | Comments: |

| **Does the LWDA have policies and procedures in place which ensure that interpreters and/or interpreter services provide interpretations as follows:** | | | | |
|---|---|---|---|---|
| With demonstrated proficiency and ability to interpret in both English and the other language, and the ability to identify consecutive, summary, simultaneous, or sight interpretations? | ☐Yes | ☐No | ☐N/A | Comments: |
| With knowledge of specialized terms and concepts of the program, vocabularies and phrases used by the LEP person? | ☐Yes | ☐No | ☐N/A | Comments: |

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# Monitoring Tool: Equal Employment Opportunity

| **Does the LWDA have policies and procedures in place which ensure the following:** | | | | |
|---|---|---|---|---|
| Those interpreters must certify that they will deliver interpretations that are accurate and not biased? | ☐Yes | ☐No | ☐N/A | Comments: |
| Those interpreters shall accept payment for services only from the LWDA and never from the client? | ☐Yes | ☐No | ☐N/A | Comments: |

| **After applying the 4-Factor Analysis, and if the need for translation of vital documents is reasonable and necessary, does the LWDA provide written translations of:** | | | | |
|---|---|---|---|---|
| Consent and complaint forms? | ☐Yes | ☐No | ☐N/A | Comments: |
| A list of One-Stop partners and services offered? | ☐Yes | ☐No | ☐N/A | Comments: |
| Appeals documents? | ☐Yes | ☐No | ☐N/A | Comments: |
| Notices requiring a response from clients? | ☐Yes | ☐No | ☐N/A | Comments: |
| Information on the right to file complaints of discrimination? | ☐Yes | ☐No | ☐N/A | Comments: |
| Information on the provision of services to individuals with disabilities? | ☐Yes | ☐No | ☐N/A | Comments: |
| State wage, hour, safety, and health information? | ☐Yes | ☐No | ☐N/A | Comments: |
| Notices of free language assistance? | ☐Yes | ☐No | ☐N/A | Comments: |

| **Does the LWDA have procedures and policies in place which ensure planning and development of:** | | | | |
|---|---|---|---|---|
| Methods of identifying LEP individuals who need language assistance? | ☐Yes | ☐No | ☐N/A | Comments: |

TN Department of Labor & Workforce Development

# Monitoring Tool: Equal Employment Opportunity

| | | | | |
|---|---|---|---|---|
| Training for staff on the available language services and how to use them? | ☐Yes | ☐No | ☐N/A | Comments: |
| Easily-accessible and widely- known notices of free language assistance? | ☐Yes | ☐No | ☐N/A | Comments: |
| Training staff on monitoring interpreter activity? | ☐Yes | ☐No | ☐N/A | Comments: |

| | | | | |
|---|---|---|---|---|
| Does the covered LWDA have policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to qualified individuals who have physical and/or mental impairments? | ☐Yes | ☐No | ☐N/A | Comments: |
| Does the covered LWDA have policies and procedures in place that ensure that individuals with qualifying disabilities will be referred for auxiliary aids and services? | ☐Yes | ☐No | ☐N/A | Comments: |
| Does the LWDA have in place communication devices, such as TTY or TDD, or an equally effective communication system, for participants with a hearing impairment? | ☐Yes | ☐No | ☐N/A | Comments: |

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# Monitoring Tool: Equal Employment Opportunity

| | | | | |
|---|---|---|---|---|
| If the LWDA has determined that the provision of accommodations would fundamentally alter the delivery of program, service, or activity, then does the LWDA have a written statement which details the reasons for reaching this conclusion? | ☐Yes | ☐No | ☐N/A | Comments: |
| Does the LWDA have clearly visible signage, at the primary entrances of each inaccessible facility that refers individuals, with disabilities, to information about accessible facilities? | ☐Yes | ☐No | ☐N/A | Comments: |
| Does the LWDA have the international symbol for accessibility at the primary entrances of each accessible facility? | ☐Yes | ☐No | ☐N/A | Comments: |

| **Do the LWDA's published personnel policies and procedures prohibit actions defined in Section 37.11 of the implementing regulations? These are:** | | | | |
|---|---|---|---|---|
| Intimidation and retaliation for filing a complaint or furnishing information regarding management of a WIOA assisted program, service, or activity. | ☐Yes | ☐No | ☐N/A | Comments: |

# Monitoring Tool: Equal Employment Opportunity

| **Is the initial and continuing notice provided that discrimination is prohibited? Is it:** | | | | |
|---|---|---|---|---|
| In internal memoranda, both hard copy and electronic? | ☐Yes | ☐No | ☐N/A | Comments: |
| In handbooks or manuals? | ☐Yes | ☐No | ☐N/A | Comments: |
| Made available to each participant and included in the participant's file? | ☐Yes | ☐No | ☐N/A | Comments: |
| Made available, in appropriate formats, to individuals with visual impairments? | ☐Yes | ☐No | ☐N/A | Comments: |

| | | | | |
|---|---|---|---|---|
| Do the LWDA's orientations and other presentations to new employees, participants, employers and the general public include a discussion of the nondiscrimination and equal opportunity provisions applicable to WIOA programs? | ☐Yes | ☐No | ☐N/A | Comments: |
| Does the LWDA system have a complaint log which is used to record any complaints of discrimination? | ☐Yes | ☐No | ☐N/A | Comments: |

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# Monitoring Tool: Equal Employment Opportunity

| | | | | |
|---|---|---|---|---|
| Does the LWDA have documentation to ensure that all On-the-Job Training plans, contracts, and other similar agreements are non- discriminatory and contain provisions regarding non-discrimination and equal opportunity? | ☐Yes | ☐No | ☐N/A | Comments: |
| How does the LWDA provide disability awareness training for designated staff at the One-Stop Center? | ☐Yes | ☐No | ☐N/A | Comments: |
| Has the contract agency received any discrimination complaints during the last fiscal year or during the current contract year? Explain. | ☐Yes | ☐No | ☐N/A | Comments: |
| What assurances of compliance have been signed by the agency? | ☐Yes | ☐No | ☐N/A | Comments: |
| When and by who were they signed? | ☐Yes | ☐No | ☐N/A | Comments: |
| What documentation does the agency keep as proof of its non-discriminatory status? | ☐Yes | ☐No | ☐N/A | Comments: |

# Appendix I: Supplemental Nutrition Assistance Program Questionnaire

**SNAP Interview Questionnaire for Contractor/Alternate State agency**

*Note to reviewer: Some of these questions are for mandatory programs only, some for voluntary programs and some are for both mandatory and voluntary. Mandatory is indicated with an "M", voluntary with a "V". The SNAP E&T program in Tennessee is a Voluntary program. Those questions that deal with Mandatory participation* ***only*** *are not required.*

**Person Interviewed:**

**Title:**

**Organization:**

**Phone:**

**Date of Interview:**

**Reviewer:**

**General**

1. I will ask some specific questions on different aspects of E&T, but first can you please explain in general terms what are your overall responsibilities in the E&T Program. Are these responsibilities spelled out in your contract with the State? M, V

2. How does the process work once the State has referred clients? M, V

3. Who do you work with in the State agency? Which members of your staff deal with the State agency? M, V

4. Has the State agency provided training to your staff on E&T? What areas? M, V

**Review Area - Work Requirements**

1. The State agency is responsible for advising clients of overall work requirements and making a determination if the household is exempt from work requirements. When and how does the State advise you that a particular client is mandatory for E&T? M

2. When and how does the state advise you that a particular client is a voluntary participant? M, V

3. If a mandatory client becomes exempt after referral to your program, who makes that decision? How does the process work? M

4. How do you keep track of participation by mandatory clients? Who is responsible? M

5. Do you use the same process to track voluntary clients? V (*Note:* If not a mandatory and voluntary program, ask, "How do you track client participation?"

**Review Area - Fair Hearings**

1. Do you have instances where a client requests a fair hearing due to work requirements imposed? M

2. What do you do if a client requests a fair hearing? What is your interaction with the State agency? M

**Review Area - Allowable E&T Components**

1. Does your agency coordinate with the Workforce Development System? If so, in what manner? M, V

2. How do you orient clients to the E&T program? Or, is this handled by the State agency? M, V

3. Which components are you responsible for providing? M, V

4. Who determines which components a client will enter? M, V

5. How does the process work for voluntary participants? Do they choose the component in which to participate? V

**Review Area - Sanctions**

1. Are you responsible for identifying non-compliance by a client? M

2. Once non-compliance is identified, what happens next? When do you advise the state? M

3. What do you do if a voluntary participant stops participating? V

4. Who monitors that the sanction process works timely? *(Note to reviewer: this may need to be addressed at both the contractor and State agency.)* M

5. Who makes the decision on whether there is good cause for non-compliance? M

6. (If applicable), are you involved in the conciliation process? How does it work? Who is responsible for working with client on conciliation? Who monitors the process? M

**Review Area - Work Hours**

1. Who is responsible for tracking the number of hours a client participates in a component? Is the process automated? M, V

2. How many hours do you require for work programs? How many hours do you require for non-work programs, such as job search? M

3. How many hours are required for volunteers? V

4. What is the control to insure that clients do not exceed the number of hours allowed by regulation? M, V

5. Has the state provided training in this area? Who in the state do you work with? M, V

**Review Area - Reimbursements**

1. Do you provide reimbursements to E&T participants? Please describe the process. M, V

2. Who makes the actual decision on which reimbursements are provided to E&T participants? M, V

3. What oversight do you have to insure reimbursements are properly provided and allowable? M, V

4. Does the state monitor your procedures and the types of reimbursements you provide? M, V

**Review Area - Compliance with Pledge (if applicable)**

1. You are working with a State that has pledged to serve all at-risk ABAWDs. Please explain your involvement in this process.

2. Does the State indicate when a client is an at-risk ABAWD?

3. What activities do you place ABAWDs in?

4. If offered a spot in a component and the client fails to participate, what happens?

5. If a client starts a component, who tracks for continued participation? How is this tracked? Is there a tracking tool?
   (*Note to reviewer: ask for a copy of the tracking tool.)*

6. If the client stops participating, what happens?

**Review Area - Monitoring of Local Operations and Contractors**

1. Does the State agency review your operation? Who in the State does this? How often are reviews conducted?

2. Does the State agency advise you formally of any problems/issues? What is the process?

3. Please describe the process when the State agency finds problems (the corrective action process.)

4. Does someone from the State agency follow up to determine if your agency has taken proper corrective action?