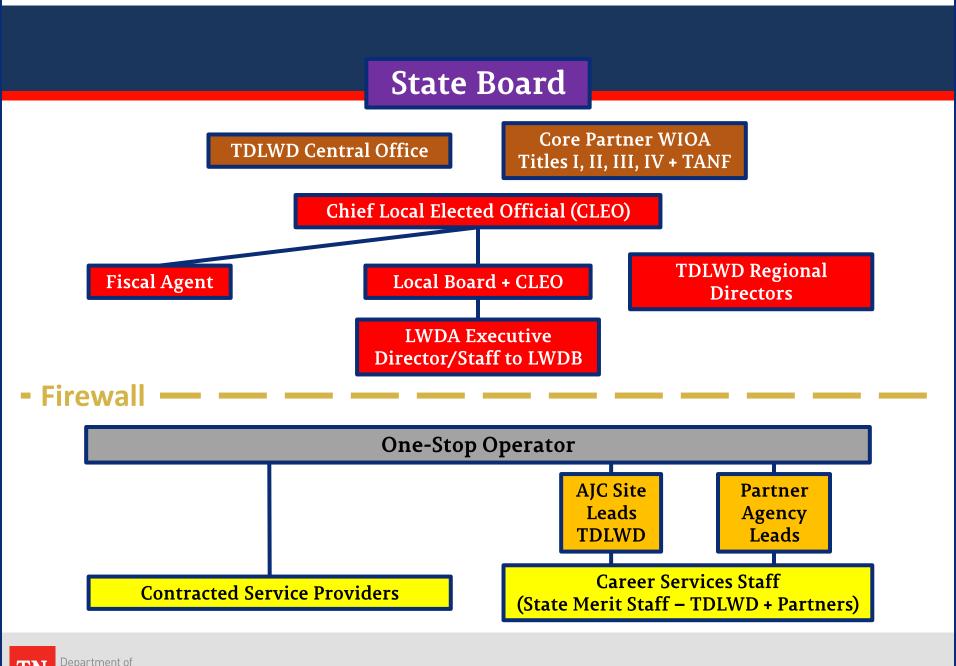# Monitoring and Compliance

November 2018

Agenda

- Why Monitor?

- Risks and Controls

- Timelines and Objectives

- Avoiding Findings

- Technical Assistance

Who is responsible for uploading documents into the VOS system?

The Fiscal Agent **A**

The Staff to the Board **B**

The One Stop Operator **C**

All of the Above **D**

Why Monitor?

The Essentials

- Federal Regulation Requirement
- State can be held responsible
- Requirements pass through as well

UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS
Section § 200.331 Section (d)

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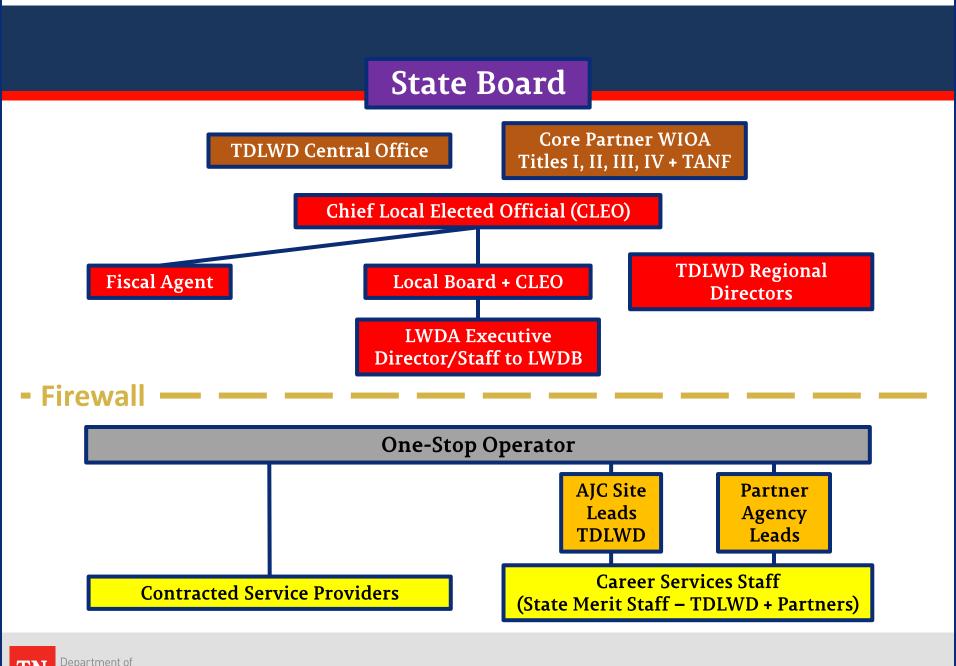
Why is Monitoring Important?

Benefits of Monitoring

- Early Intervention
- Preventative and Proactive
- Stronger working relationships
- Coaching and Technical Assistance
- Education and Training

Risks vs Controls

Program Accountability Review(PAR)

On-Site Visit:What to Expect

- Local Governance

- Firewall Provisions

- Career Services

- Fiscal

- Local Monitoring

Desktop Monitoring

What to Expect

- Strategic Sampling
- Per Area - 5 Exited; 5 active
- Review from Attribute Sheets
- Corrective Action

Monitoring Cycle

Jan-Mar → Apr-Jun → Jun-Aug

Desktop Monitoring

-Random Sample

-5 Exited

-5 Active

PAR Visits

-Feb Start

-On-Site

Corrective Actions

-To begin immediately after Report is released

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Monitoring

Frequent Findings

- Case Management
- Timely entry of documentation and applications
- Minimum Participant Cost Rate (MPCR)
- 20% Youth Work Experience
- Timeliness of Report Submission
- Complaint Log Submission

Corrective Action Plans (CAPs)

- Address the Finding as a whole
- No "Band-Aid" Fixes
- Review and Response
- Follow Up

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Disallowed vs Questioned

Disallowed Costs

Alcohol

Foreign Travel

Facilities/Construction

Entertainment

Taxes

Questioned Costs

Refreshments

Travel

Admin/Clerical Salaries

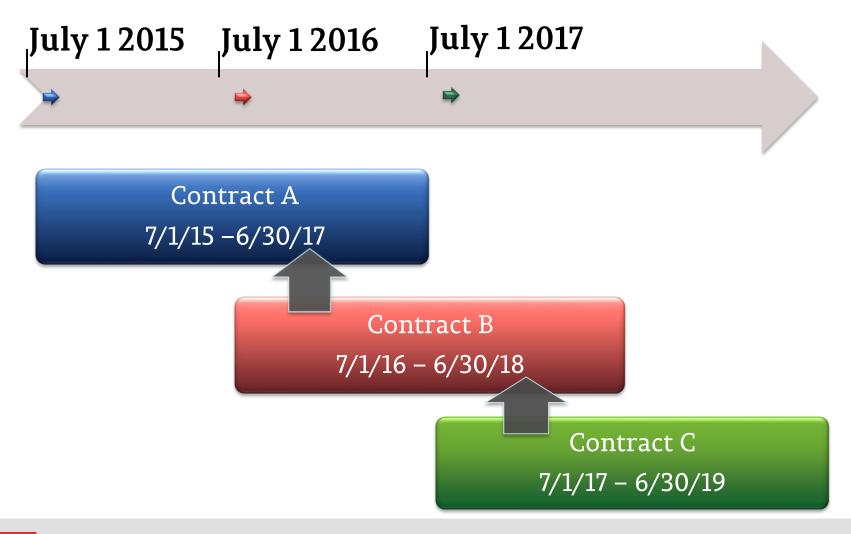TN Department of Labor & Workforce Development

Correcting Disallowed Costs

- Is the Contract Open or Closed?
- Correcting Entry
  - Like Funding Stream
  - Overlapping Period
  - Allowable
- Drawdown Reduction

Correcting Disallowed Costs

July 1 2015   July 1 2016   July 1 2017

Contract A
7/1/15 – 6/30/17

Contract B
7/1/16 – 6/30/18

Contract C
7/1/17 – 6/30/19

Monitoring and Compliance

No Surprises

- Section A.4. – Use of Jobs4TN
- Section A.5. – Service Goals
- Section A.6. – Reporting Requirements
- Section C.11. – Non-Allowable Costs
- Section D.16. – Monitoring
- Section C.12 – State's Right to Set Off

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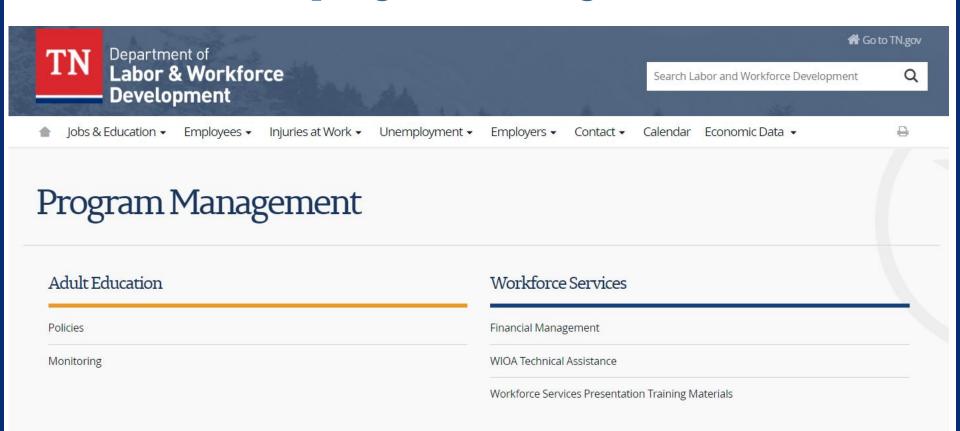
Remedies and Sanctions

Consequences:

- Additional Support Documentation
- Temporarily withhold Infrastructure payments
- Not Covering Admin Costs
- Probationary Status
- Other Legally available Remedies

Guidance

www.tn.gov/workforce/general-resources/program-management.html

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🏠 Go to TN.gov

Search Labor and Workforce Development

🏠 Jobs & Education ▾   Employees ▾   Injuries at Work ▾   Unemployment ▾   Employers ▾   Contact ▾   Calendar   Economic Data ▾

Program Management

Adult Education

Policies

Monitoring

Workforce Services

Financial Management

WIOA Technical Assistance

Workforce Services Presentation Training Materials
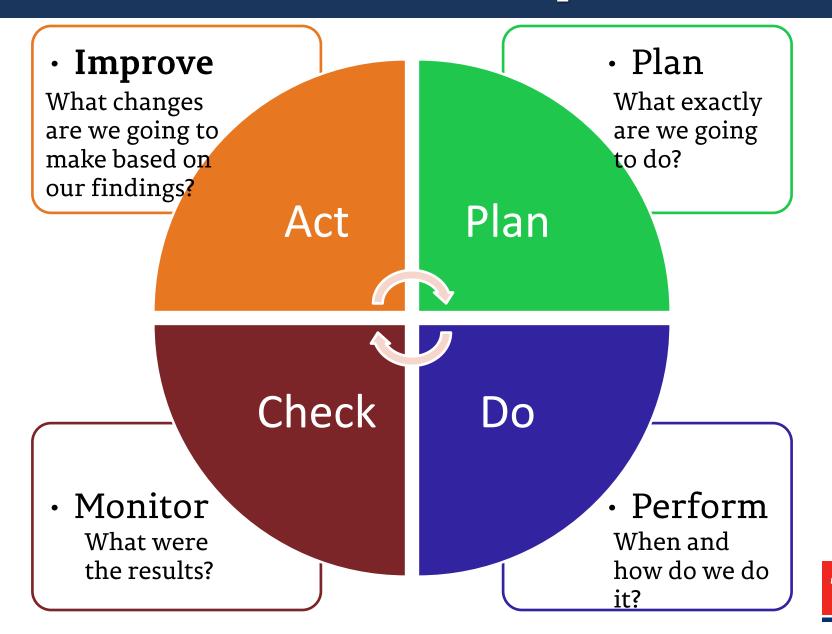
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Realign Your Mind & Actions

- Technical Assistance = various resources and tools that assist local workforce practitioners
  - Coaching
  - Best Practices
  - Webinars
  - Conferences
  - Certified Workforce Professionals

Model for Continuous Improvement

- **Improve**
  What changes are we going to make based on our findings?

- Plan
  What exactly are we going to do?

- Monitor
  What were the results?

- Perform
  When and how do we do it?

Act

Plan

Check

Do

TN

How can we Help?

- Contracts and Procurements
- Certification
- Case Management
- Infra-Structure Funding Agreements/MOUs

zendesk support

Thank You

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- Director, Special Projects and Technical Assistance

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