

**St. Louis County Workforce Development**  
**Sub-State Monitoring Policy and Procedures**

*In accordance with OWD Issuance 12-2019; Statewide Sub-state Monitoring Policy*

WIOA mandates program oversight responsibilities that, in partnership with the Chief Elected Official (CEO), are inherent functions of the Local Workforce Development Board (Local WDB) serving an LWDA.

*The local board, in partnership with the chief elected official for the local area, shall—*

*(A)(i) conduct oversight for local youth workforce investment activities authorized under section 129(c), local employment and training activities authorized under subsections (c) and (d) of section 134, and the one-stop delivery system in the local area; and*

*(ii) ensure the appropriate use and management of the funds provided under subtitle B for the activities and system described in clause (i); and*

*(B) for workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcome under section 116.*

1. **Responsible Representative**—St. Louis County Workforce Development’s Compliance Unit is responsible for Sub-State monitoring. A sample is sent to sub-recipient staff based on the file sample procedures listed below. The Compliance Unit conducts the reviews and are in constant communication with the sub-recipient to ensure that errors and/or findings are corrected. When the sub-state monitoring review is completed, a report is sent to the CEO and the Board Chair. The report is also presented to the Workforce Development Board annually.
2. **Accountability**—A report must be submitted to the Workforce Development Board for each program year.
3. **Compliance and Performance**—The report includes a review of all WIOA programs and non WIOA programs. Other areas to cover in monitoring reports are performance, the adequacy of assessment, activity and service planning, partner coordination to meet needs, and outcomes. All identified problems must be promptly and appropriately resolved by the due date set forth by the Compliance Unit.
4. **Methodology and Target Universes**—Monitors must use random-sampling techniques in participant file reviews to test the compliance in every funding stream for which the enrollment was completed.

When monitoring WIOA Adult and Dislocated Worker participant records, combine the two funding streams, then sample by service.

- Classroom Training
- On-the-Job Training
- Work experience/Internships/Apprenticeship
- Supportive Services/Needs-related payments
- Any other services that result in a direct payment being made to or on behalf of the participant

Depending on the size of each record set requiring review, the corresponding number of sample records shown below, at a minimum, must be examined. These guidelines are applicable for every review.

<u>Record Set Size</u>	<u>Sample Size</u>
1-200	69
201-300	78
301-400	84
401-500	87
501-1,000	96
1,001-2,000	100
2,001-10,000	105

St. Louis County Sub-state Monitoring begins in September each year. It begins with the desk-top monitoring of the programs.

**Step 1:**

To prepare for desk-top monitoring portion of the Sub-State Monitoring you should follow these steps:

1. Use the state case management system to retrieve the case load lists of all programs
2. Randomly select participants to review according to the required sample size and services outlined within DWD Issuance 15-2017 and above.
3. Using an Excel or Access spreadsheet is highly recommended to keep track of your monitoring results
4. Perform the desk-top monitoring according to the parameters outlined in OWD Issuance 08-2018, 09-2018 and above.

**Step 2:**

In tandem, once the participant records are selected, letters are sent to the sub-recipients announcing the pending monitoring. The steps are as follows:

1. Select the dates the participant records should be submitted for each program
2. Select the dates the record review will begin for each program
3. Prepare the letters, on Human Services letterhead, for each sub-recipient advising them of the upcoming sub-state monitoring. See the attached example of the letter.
4. Send, via email, the appropriate letter to the respective directors of each sub-recipient.

**Step 3:**

After the letters are sent, the next correspondence is the email requesting the participant records. The steps are as follow:

1. Use Excel or Access to create a list of the participants. The list should include their state case management system state id number, last name and first name.
2. Email the respective lists to the appropriate sub-recipient one week prior to the due date.

The participant records should be submitted on or before their due date. At that time, monitoring of the participant record can begin.

**Step 4:**

St. Louis County's Compliance Unit will actively try to resolve all findings. Waiting until the end is not optimal, it allows the sub-recipients to repeat the errors and places the LWDA at risk of State and/or Federal findings. Continuous Improvement training is determined during sub-state monitoring by the Board and scheduled training is done accordingly.

## **Step 5:**

Once the participant desktop and record reviews are finished, memorandums are sent to the CLEO, Board Chair, and the Director of the Division of Workforce Development. The sub-state monitoring item is put on the upcoming WFDB meeting calendar to be presented to the entire WFDB.

### **DATE ELEMENT VALIDATION PROCEDURES.**

When Job Center customers receive services beyond the Wagner-Peyser registration (Basic Services) level, a higher degree of documentation is required. An explanation for all WIOA expenditures at the Training and/or Staff Assisted levels must be recorded in the State MIS system. When staff enter a customer into WIOA a justification for that decision must be recorded in the State MIS database. In cases where customers are enrolled in a Training Activity, staff must case note to record progress.

Equally significant is the federal and state mandate to accurately report client outcomes. ALL Job Center services must be appropriately recorded in the State MIS database to substantiate WIOA expenditures and to calculate performance measures. It is important for federal performance reporting (including Data Element Validation) to record all client information in the State MIS database pre/post WIOA participation. To accurately report outcomes for individuals served on a training and/or staff assisted level, staff must document:

- On a Training level staff must document attainment of a degree or certificate
- Staff must record a client's employment status at completion of training and the four quarters following program exit

Follow-Up Career Services must be available to all Adult program and Dislocated Worker program participants for as long as 12 months after the first day of unsubsidized employment. An attempt must also be made to provide WIOA Follow-Up Career Services to ALL Youth Program participants for a minimum of 12 months after the completion of participation.

Data Element Validation is performed at the end of each quarter. This will be: October, January, April, and July by the 15<sup>th</sup>. St. Louis County's WFDB's Compliance Director and Unit monitors DEV using the Sample Size justification scenario as used when choosing samples for Sub-State monitoring procedures. DEV consists of reviewing records to ensure that all required program elements have been documented and reported accurately. This is done in accordance with OWD Issuance 07-2020 and TEG 23-19.

Data Element Validation is reviewed once a year by the Compliance Unit. The Compliance Unit will reach out prior to the date of the review to set up date/time for file submissions. This usually happens at least 14 days prior to the Compliance Unit's review start date. Gathering the files and ensuring that all files are present and all documentation that was reported it is readily available for review is mandatory.

Once the DEV reviews are completed for the program year, an annual report will be sent to the CLEO, Board Chair, and the Director of the WFD Division. The report is then placed on the WFDB agenda to be presented at the next available WFDB meeting.

For more information regarding this policy please contact St. Louis County WFDB's Compliance Director: Dr. Tiffany Manning; [tmanning@stlouisco.com](mailto:tmanning@stlouisco.com).