

**THE OREGON CONSORTIUM & OREGON WORKFORCE ALLIANCE
POLICY MEMORANDUM #WIA-8-09/01**

ISSUE DATE: September 15, 2001

SUBJECT: Quality Assurance and Program Oversight Reviews

REFERENCES:

- Workforce Investment Act, Sections 117(d)(4), 184(a)(2)(A), 184(a)(3)(A), and 184(a)(5)(A)
 - Title 20 Code of Federal Regulations (CFR) 667.400(c)(1), 667.410(a), and 667.410(f)(6)
 - Title 29 CFR Parts 95 and 97
 - Office of Management and Budget (OMB) Circular A-21, Cost Principles for Educational Institutions
 - OMB Circular A-87, Cost Principles for State, Local and Indian Tribal Governments
 - OMB Circular A-122, Cost Principles for Non-Profit Organizations
 - TOC/OWA Policy #WIA-10-09/01
 - TOC/OWA Policy #WIA-17-09/01
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PURPOSE:

To facilitate self assessment and continuous improvement of system operations for regional subgrant recipients; to ensure compliance with all applicable Federal and State laws; to maximize the effectiveness and efficiency of the One-Stop delivery system; and to minimize potential financial liability to The Oregon Consortium & Oregon Workforce Alliance (TOC/OWA) in the administration of Workforce Investment Act (WIA) programs.

BACKGROUND:

The WIA, Section 117(d)(4) requires that the Local Board, in partnership with the Chief Elected Official (CEO), shall conduct oversight of the WIA programs and the One-Stop delivery system in the local workforce investment area (LWIA).

The WIA, Section 184 and 20 CFR 667.200 require the LWIA and providers receiving funds under Title I to comply with the applicable uniform OMB cost principles and uniform administrative requirements for grants and agreements applicable for the type of entity receiving the funds.

20 CFR Section 667.400(c)(1) requires that subrecipients must continuously monitor grant-supported activities in accordance with the uniform administrative requirements at 29 CFR Parts 95 and 97, as applicable. 20 CFR Section 667.410(a) requires that each subrecipient must conduct regular oversight and monitoring of its WIA activities and those of its lower tier subrecipients and contractors.

DEFINITIONS:

Corrective Action - Plans for improvement are developed in response to program improvement identification, i.e., a finding that is of a compliance nature.

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

POLICY:

TOC/OWA will comply with the monitoring requirements of WIA by conducting annual quality assurance reviews of its administrative office in conjunction with the State's annual review and of its regional sub-grant recipients.

TOC/OWA and its regional subgrant recipients will oversee activities funded under WIA Title I, conducted under the local plan established pursuant to WIA, Section 118. In addition, TOC/OWA and its regional subgrant recipients will oversee activities of the One-Stop delivery system established pursuant to WIA, Section 121. The monitoring and oversight will be consistent with the requirements stated in WIA and its associated regulations, as well as other relevant regulations and OMB circulars. The quality assurance and oversight will include the following:

1. Fiscal and programmatic quality assurance reviews of all regional subgrant recipients must occur at least once each program year. The annual audit will be incorporated into the fiscal portion of the quality assurance review.

This oversight will include but is not limited to the following:

Fiscal:

- Internal Controls
- Procurement
- Financial Transactions
- Cash Management
- Cost Allocation
- Cost Limitations
- Allowable Costs
- Property Management

Programmatic:

- Eligibility and File Review
- Delivery of Services
- Quality of Services
- Customer Satisfaction
- EEO Requirements

2. Examination of the One-Stop delivery system for efficiency, subcontractor performance, quality and compliance, and to support a continuous improvement process.
3. Assessment of the quality of services provided in the One-Stop system by reviewing: recruitment, provision of training services; program design and management; job placement policies and practices; and employment outcomes.
4. Analysis of the performance standards for achieving objectives of TOC/OWA.
5. Review the resolution of prior audit, quality assurance and oversight report findings and the status of corrective action.
6. The oversight will provide a forum to effectively share best practices through a peer-to-peer review process.

PROCEDURE:

Oversight of all regional subgrant recipients will follow a standardized review methodology that will result in written reports, which record commendations, recommendations and findings. Any findings will result in the establishment of corrective actions, and due dates for the accomplishment of corrective actions. Systematic follow-up will be taken to ensure necessary corrective actions.

All written reports and other documentation pertaining to quality assurance and oversight activities must be made available for review by federal and State officials.

I. TOC/OWA INTERNAL ADMINISTRATIVE REVIEW

The annual internal review will be conducted by State quality assurance staff in conjunction with TOC/OWA staff, during the State WIA Annual Assessment.

TOC/OWA Quality Assurance Staff Responsibilities:

1. Coordinates with State quality assurance staff.
2. Conduct a quality assurance review of financial and statistical reports, compliance requirements and compliance with internal policies.
3. Review State written QA review report and respond if necessary.
4. Report any corrective action plans and follow-up to the Executive Director.

II. REGIONAL SUBGRANT RECIPIENT QUALITY ASSURANCE REVIEW

This review will examine all WIA programmatic and fiscal activities for a full year beginning with the date of the prior annual on site visit to the date of the current year review.

TOC/OWA Quality Assurance Staff Responsibilities:

1. Coordinate with the regional program staff regarding the time, place and work sites to be reviewed. The regional program staff arranges site interviews for review team members with participants, employers and others.
2. Conducts desk review prior to an on-site visit. The desk review shall include, but not be limited to prior audit and monitoring issues and findings, the current year Quality Assurance Self-Assessment Monitoring Guide, performance, cash draws and/or billings, incident reports, complaints and grievances, compliance with reporting requirements, etc.
3. Conducts an on-site entrance conference with the regional sub-grant recipient staff to review assessment procedure and scope of the review.
4. Conducts on-site quality assurance review.
5. The quality assurance review team conducts an exit conference and reviews findings with the regional subgrant recipient. If necessary, a mutually agreed upon corrective action plan will be developed prior to or during the exit conference.
6. Meets with administrative office staff to debrief results of on-site visit.
7. Prepares a final quality assurance review report.
8. Forwards a copy of the final quality assurance report to the TOC/OWA Executive Director within four weeks following the conclusion of the onsite review.
9. Review follow-up activities with regional subgrant recipient, as needed, and may conduct a follow-up visit if necessary.

TOC/OWA Executive Director (or Designee) Responsibilities:

1. Review and transmit final Quality Assurance Report.
2. Reports quality assurance review results to the local Workforce Investment Board.

III. LOCAL QUALITY ASSURANCE REVIEWS CONDUCTED BY REGIONAL SUBGRANT RECIPIENTS

The contractor shall establish and use local internal control and quality assurance procedures which, at a minimum, include those areas identified in TOC/OWA's policy regarding oversight and quality assurance reviews and which are sufficient to assure compliance with local, state and federal laws and regulations. These procedures shall include, but are not limited to periodic on-site review of contractors' subcontracts and subcontractor's records pertinent to WIA participant eligibility and file reviews, performance, expenditure rates against contract and budget, fiscal management, cash management, prior monitoring/audit issues and status of corrective action, property management, etc.

Regional subgrant recipients' Responsibilities:

1. Conducts ongoing reviews of current programs and systems.
2. Conducts periodic on-site review of work-sites and examines pertinent records.
3. Completes quality assurance review instrument.
4. Maintains documentation including reports and review work papers to attest to ongoing local review effort.

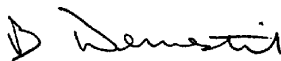
ACTION:

Establish or revise local oversight and monitoring plans, policies, and procedures in accordance with the requirements of this directive. Bring this directive to the attention of all appropriate staff.

The TOC/OWA administrative office and the regional subgrant recipients shall follow this policy. This policy will remain in effect until such time that a revision is required.

INQUIRIES:

Inquiries should be addressed to the Quality Assurance Coordinator at 1-866-888-4TOC.



Bill Demestihis
Executive Director