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PY20 WIOA Monitoring Report

Pacific Mountain Workforce Development Council (PacMtn)

Serving Grays Harbor, Lewis, Pacific, Thurston, and Mason Counties

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Monitoring Review Date

February 1-5, 2021

June 6-12, 2021



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EXECUTIVE SUMMARY

Background and Monitoring Objective

Employment Security Department's Workforce Monitoring Unit (ESD's Monitoring Unit) conducted an annual compliance review of the Pacific Mountain Workforce Development Council on February 1-5 and June 6-12, 2021. The review was conducted in accordance with the Uniform Administrative Requirements 2 CFR Part 200; the Workforce Innovation and Opportunity Act (WIOA), Sec. 184(a)(4); and additional requirements established by Department of Labor Employment and Training Administration (DOLETA) and ESD policies, rules, and regulations.

Scope

In keeping with general monitoring practices, not all transactions and activities were examined. ESD's Monitoring Unit randomly selected individual participant files and administrative/fiscal documents for review. The following areas were examined and tested during this review period:

WIOA Title I Formula Program Review

WIOA Program Policies

- Eligibility Guidelines and Documentation Requirements (ESD Policy 1019, Rev. 4)
- Supportive Services and Needs-Related Payments (ESD Policy 5602, Rev. 2)
- Follow-up Services for Adult and Dislocated Workers (ESD Policy 5620)
- Incentive Payments for Youth (ESD Policy 5621, Rev. 2)
- If applicable:
 - Customized Training (ESD Policy 5616, Rev. 1)
 - Incumbent Worker (ESD Policy 5607, Rev. 4)
 - Transitional Jobs (TEGL 19-16)
 - Incentive Payments for Adults (ESD Policy 5621, Rev. 2)
 - Integrated Service Delivery Policy and Procedures (ESD Policy 1023, Rev. 1)
- All Other policies and/or procedures, memos, technical assistance guides, etc. developed for the implementation of your WIOA formula and/or discretionary grants. Examples include, but are not limited to:
 - ETO
 - Self-sufficiency
 - Case Notes
 - Work Experiences
 - On-the-Job Training
 - Youth Objective Assessment and Individual Service Strategies
 - Youth Follow-up

WIOA Adult and Dislocated Worker Programs

- Eligibility
- Priority of Service (Adult Program Only)
- Program Enrollment
- Basic and Individualized Services
- Supportive Services
- Training Services
- Outcomes
- Program Completion
- Follow-up Services
- Self-Attestation
- MIS/ETO

WIOA Youth Program

- Eligibility
- Objective Assessment
- Individual Service Strategy
- 14 Program Elements
- Program Enrollment
- Outcomes, when applicable
- Program Completion, when applicable
- Follow-up Services, when applicable
- Self-attestation, when applicable
- MIS/ETO
- Case Notes
- Miscellaneous Observations

WIOA Title I Formula Administrative and Fiscal Review

- Design and Governance of the LWDB
- MOU/IFA/RSA
- One-Stop Operator
- Policies/Procedures
- Administrative Controls and Monitoring (Subrecipient/Contractor and Pass-Through Entity)
- Internal Controls
- Cash and Financial Management
- Procurements & Contracts
- Cost Allocation Plan or Rate
- Property & Inventory
- Single audit
- Personnel
- Grievance and Complaint
- Support Services & Needs Related Payments
- Incumbent Worker

Statewide Discretionary Contracts Compliance Review Increase Employment – Rapid Response; National Health Emergency Dislocated Worker Demonstration Grant (OPIOID); National Health Emergency Dislocated Worker Demonstration Grant (OPIOID Phase 2)

Administrative and Fiscal

- Cash and Financial Management/A19 reimbursements
- Administrative controls (Sub-recipient monitoring)
- Procurements & Contracts
- Personnel Activity Reports and Cost Allocation

MONITORING REVIEW COMMUNICATIONS

To ensure transparent communication occurred during the monitoring review, ESD's Monitoring Unit conducted an online, virtual entrance meeting with PacMtn staff on the first day of the review. The entrance meeting provided an opportunity for the monitoring agenda to be finalized, points of contact identified and confirmation of other monitoring related activities. The entrance meeting also provided an opportunity for PacMtn staff to share changes that occurred in their area since the last ESD monitoring review, challenges, and successes they have experienced, and future endeavors.

There were regularly scheduled daily meetings with ESD's Monitoring Unit and PacMtn's administrative, fiscal, and program staff to maintain engagement and communication during the virtual review. At the end of each day, ESD's Monitoring Unit provided PacMtn staff a Daily Observation Report (DOR).

The exit meeting provided PacMtn staff with a summary of the compliance review, outstanding items to address (if applicable), noted practices observed during the visit, and next steps in the ESD monitoring process.

DOCUMENTATION OF REVIEW

DOR's were shared with PacMtn staff at the end of each day summarizing ESD Monitoring Unit's activities and observations up to that point. DORs included any items to address, questioned or disallowed costs (if applicable), and documentation of items to address that may have been resolved during the review. The final DOR from the review was provided to PacMtn staff on June 16, 2021.

MONITORING OBSERVATIONS

Program - WIOA Adult:

ESD's Monitoring Unit reviewed ten (10) WIOA Adult files. There were no findings, questioned costs or disallowed costs.

Program – WIOA Youth:

ESD's Monitoring Unit reviewed eleven (12) WIOA Youth files. There were no findings, questioned costs or disallowed costs.

Program – WIOA Dislocated Worker:

ESD's Monitoring Unit reviewed ten (10) WIOA Dislocated Worker files. There were no findings or disallowed costs. There was a cost that was questioned but that was resolved.

Administrative & Fiscal Review:

The Monitoring Unit found the following administrative and fiscal procedures to be compliant with the following State and Federal requirements:

- Design and Governance of the LWDB
- MOU/RSA/IFA
- One-Stop Operator
- Policies/Procedures
- Administrative Controls and Monitoring (Subrecipient/Contractor and Pass-Through Entity)
- Internal Controls
- Procurements & Contracts
- Property & Inventory
- Single Audit
- Personnel
- Grievance and Complaint
- Support Services & Needs Related Payments
- Incumbent Worker

In the review of 1.9 Cost Allocation Plan or Rate, the ESD Monitoring Unit identified a disallowed cost as personal flowers were purchased for an employee and charged to the indirect pool account, then allocated. The flowers were purchased on 3/19/2021 in the amount of \$113.63. PacMtn WDC provided the ESD Monitoring Unit with supporting documentation on 6/15/2021 to reflect that the disallowed cost has been reimbursed to the deferral grant utilizing non-federal funds. This item has been resolved.

NOTED PRACTICES

Noted practices observed during the program review include:

All programs- Eligibility Case Notes – Enrollment case notes provided great detail about participant eligibility, purpose for enrolling into the programs and planned services.

RESULTS

ESD's Monitoring Unit determined, as a result of the review, there were no findings and one (1) disallowed cost, that has been resolved.