



POLICY TRANSMITTAL

SUBJECT:		Procedural/Guidance No.: # 1 PY 2009-2010
APPLIES TO:	All Contracted Youth Service Providers	Effective Date: October 15, 2009
		Expiration Date: Indefinite
REFERENCE:	Workforce Investment Act, Code of Federal Regulation, Office of Management Budget and Local Policy	

OBJECTIVE

It is the policy of the South Florida Workforce Investment Board (SFWIB) to inform all WIA Youth Service Providers of the requirements regarding the procedures under performance monitoring and corrective action processes. The purpose of this policy is to establish a comprehensive performance accountability system. The requirements under this policy are intended to hold youth service providers accountable for the results achieved by their youth program(s). This policy will also assess the effectiveness of youth service delivery and promote continuous improvement.

BACKGROUND:

Program oversight is a requirement under the Workforce Investment Act. Monitoring and oversight must be consistent with the requirements stated under WIA, as well as other relevant regulations and the Office of Management and Budget (OMB) circulars. Section 117(d)(4) of the Workforce Investment Act requires Local Boards to conduct oversight of the WIA programs. Title 20 CFR Section 667.4(c)(1) requires continuous monitoring of activities in accordance with the uniform administrative requirements, as applicable. Title 20 CFR Section 667.410(a) requires that Local Boards must conduct regular oversight and monitoring of its WIA activities and those of its sub-recipients. The purpose of this requirement is to ensure that expenditures meet the programmatic, performance, cost category and cost limitation requirements of WIA and the regulations; to determine that there is compliance with other provisions of the WIA regulations and other applicable laws and regulations and to ensure that technical assistance is provided as needed.

PROCEDURES:

SFWIB Quality Assurance Unit is responsible for conducting programmatic monitoring reviews of the youth programs funded under the Workforce Investment Act (WIA) to ensure that administrative policies, practices, standards and systems are operating within established federal and state legislation, regulations and policy directives. The programmatic review is used to evaluate SFWIB contractual quality assurance processes, as well as issue error rates and programmatic performances. Each monitoring

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review results in a formal report which includes all non-compliance issues along with the corresponding reference(s).

After each WIA Youth Program quality assurance monitoring review is completed, all deficiencies will be brought to the attention of the applicable Youth Program Manager. Providers will be provided the opportunity to discuss and review all findings with SFWIB to ensure the accuracy of deficiencies being reported.

When a youth provider's quality assurance monitoring final error rate exceeds three percent (3%), SFWIB will require a Plan of Corrective Action (POCA) be submitted within ten (10) business days of the receipt of the final quality assurance report. The POCA will identify specific processes to be implemented to ensure that discrepancies are correctly addressed and minimized in the future; SFWIB require quality control details, the frequency of each control to be implemented, the individual(s) responsible for cited tasks and any applicable documentation used for training and process improvement.

A quality assurance monitoring review error rate that exceeds 10%, failure to submit an acceptable POCA and/or failure to comply with previously accepted POCA measures may result in placement on a Performance Improvement Plan (PIP). Placement on a PIP will require the youth provider to submit bi-weekly quality assurance updates to SFWIB staff. The specific content required in these bi-weekly updates will be presented in a formal PIP letter. The PIP will provide SFWIB with confirmation that the provider is making every effort to follow federal, state and local policies, while minimizing errors and preventing deficiencies.

SFWIB reserves the right to increase the severity for uncorrected non-compliance findings.

1. Two or more non-compliance findings of similar nature within six months of each other will be deemed to be consecutive for purposes of determining failure to comply with conditions as stated in the Contract, Statement of Work and other policy directives.
2. If after the ten day period, some non-compliance findings remain unresolved, a recommendation will be submitted to the Youth Council for the reduction of the service provider's allocation in the amount of 5%. In addition, all payments to the youth service provider will be immediately suspended until all monitoring non-compliance findings are resolved.

Training and technical assistance is always available to our youth service providers upon request to SFWIB.

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