



South Central **WORKFORCE** *Investment Board*



SUSTAINABILITY PLAN (Attachment to PY22-23 Annual Agreement)

Effective
July 1, 2022

Contract Period
July 1, 2022- June 30, 2023

Contact Person:
Donna Parrott, Executive Director
South Central Workforce Investment Board
408 Washington Ave, Suite 210
West Plains, MO 65775
dparrott@scwib.org

Equal Opportunity- Equal Access

South Central Workforce Investment Board is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

PY'22 Annual Agreement

3. Submission Requirements

(a) Sustainability Plan to include Sub-recipient(s) information:

Section 1:

PY21/FY22 Admin Board Expenses				
Total WIOA Admin Budget from State		\$ 107,133.40	10% of our PY22/FY23 Budget	
			of \$	1,071,373.00
Salaries	\$ 58,209.20			
Payroll Taxes	\$ 3,958.25			
Fringe Benefits	\$ 3,000.00			
Retirement	\$ 1,835.46			
Rent	\$ 15,375.00			
Phones	\$ 1,440.00			
Office Supplies	\$ 3,440.00			
Travel for Staff	\$ 4,500.00			
Board Expenses	\$ 3,000.00			
Computer Expense	\$ 6,276.00			
CPA Audit	\$ 10,000.00			
Insurances	\$ 13,800.00			
Total Admin Budget		\$ 124,833.91		
Admin Budget over Income		\$ (17,700.51)		
This deficite will be made up By Carry Over Money				
WIB Program 20%		\$ 192,847.92		
Job Center Cost Share	\$ 27,900.00			
Program D Parrott	\$ 45,502.91			
Program C Staton	\$ 39,637.50			
Total WIB Program		\$ 113,040.41		\$ 79,807.51
Sub Receptient 80%		\$ 771,391.68		
Total WIOA PY21/FY22 Budget		\$ 1,184,413.41		

South Central Workforce Investment Board		
Salary and Fringe		
Executive Director	Minimum	Maximum
Annual Salary	52,000	82,000
Annual Fringe	15,600	24,600
	67,600	106,600
Quality Assurance Manager & EO Officer	Minimum	Maximum
Annual Salary	34,000	50,000
Annual Fringe	12,600	14,700
	46,600	64,700
Fiscal Manager (Job Share with Central WIB)	Minimum	Maximum
Annual Salary/Fringe	14400	18000

WIOA Staff - EDSI	
Salary and Fringe	
Regional Program Manager - 1	
Annual Salary	55,000
Annual Fringe	17,160
	72,160
Employment Specialist - 5	
Annual Salaries	200,000
Annual Fringe	62,400
	262,400
Corporate Staff (Accounting, Management, Continuous Improvement) This includes Transition Team for first year	
Total Salaries	74,380
Total Fringe	23,207
	97,587

3.(a) Section 2: A full list of job centers, sub-recipients, and locations

Full Job Centers –

West Plains Missouri Job Center
408 Washington Ave., Suite 100
West Plains, MO 65775

Poplar Bluff Job Center
2080 Three Rivers Blvd
Crips Technology Center
Three Rivers College
Poplar Bluff, MO 63901

Sub-Recipient --

EDSI (Educational Data Systems, Inc.)
15300 Commerce Drive North
Dearborn, MI 48120

3.(a) Section 3: Annual training and QA plan

Annual training –

EO will be providing monthly training by formulating a plan that entails various EO inquiries from WIOA and partner staff.

Any new staff will be trained on MoJobs, Confidentiality, and WIOA Section I-88. Other technical training and assistance will be provided through Wise-Up-Wednesday and OWD's Learning Management System (LMS).

Our new WIOA Sub-Recipient EDSI has a very comprehensive and encompassing onboarding procedure for their new staff. They outline training in a 4-week schedule and inputs required training that the local board feels is essential. They work with the local board throughout the new hire onboarding process. EDSI has established guidelines for continuous training for all their staff.

QA plan –

As part of OWD's PY21 monitoring review of our region, we are continuing to monitor all participant files as required. This is something that we would be doing as well since EDSI is a new sub-recipient.

The Data Element Validation is processed on a quarterly basis as required by OWD. This process consists of the following:

- Verify that the performance data reported by grant recipients to DOL are valid, accurate, reliable, and comparable across programs;
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting;
- Outline source documentation required for common data elements; and
- Improve program performance accountability through the results of data validation efforts

3.(a) Section 4: previous year participant volume, projected new year participant volume;

Job Center	Youth		Adult		Dislocated Worker		Total	
	PY21	PY22	PY21	PY22**	PY21	PY22	PY21	PY22
Poplar Bluff	14	20	39	100	8	20	61	140
West Plains	19	20	102*	100	15	20	136	140
Total	33	40	141	200	23**	40	197	280

*Includes WIOA ABC

**Will include WIOA ABC

***Includes 3 Dislocated Worker with MOWorks Together

3.(a) Section 5: A plan for ensuring services to participants are not disrupted in the event of any staff or location reductions after implementations;

How to recruit and train staff:

We have worked extensively with our new Sub-Recipient EDSI in formulating a recruitment plan for the Regional Program Manager and the Employment Specialists. EDSI has a thorough recruitment process that involves a team of their staff reviewing applications, doing initial phone interviews, and then moving forward the applicants that they have vetted to the in person/virtual interview. Any management candidates (Regional Program Manager) has an additional interview with other management staff. All candidates that are considered viable and are offered employment are required to take the Acu-Max Index to see how they best will work with their team. EDSI has a very comprehensive and encompassing onboarding procedure for their new staff. They outline training in a 4-week schedule and inputs required training that the local board feels is essential. They work with the local board throughout the new hire onboarding process. EDSI has established guidelines for continuous training for all their staff.

EDSI also ensures that new hires have resources available to them to make them successful. One of these resources is that they team them up with a ‘mentor’. The mentor is a EDSI peer that can help answer any questions they might have concerning the EDSI way.

Will centers need to be closed/opened:

We do not anticipate having to close either of our Job Centers. With relocating the Poplar Bluff location June 1 of this year, we were able to reduce annual costs by over \$45,500. The relocation of the West Plains job center March of 2021 has saved an annual amount of \$24,000. This total cost savings of \$69,000 is substantial and shared based on the FTEs that OWD, SCWIB, and our partners have in each job center.

Increase connection centers:

As we work with our new sub-recipient EDSI, we will be establishing connection centers throughout our 12-county region. Our plan is to work with the CLEOs in each of the counties to see where they feel connection points would be most beneficial to their county residents. We will also be reaching out to the public libraries in our region and any other entity that would like to be a connection center. These connection centers will not house a full-time Employment Specialist but will have a computer and internet connection that will allow residents to go to the MoJobs website to use the services that are available to them at no cost.

Will you partner with other regions:

South Center has been partnering with other regions for cost savings measures. For the past year we have been job sharing our Fiscal Officer with the Central Region. This has been a substantial cost savings on our admin budget.

South Central region was asked to join in a partnership with Ozark, Center, and Southeast regions to work on an EDA grant. This grant has a \$17+ million ask with South Central region asking for \$3,000,000. The grant has not been rejected at this point. All four regions feel this is a good thing as we have been requested on 3-4 different occasions to submit additional information.

We will continue to look at partnering with other regions for grant opportunities.

Improve coordination of services with partners:

South Central region continues to look at ways to improve the coordination of services with partners. Part of the WIOA staff onboarding process with our new sub-recipient EDSI will include partner presentations where they will be able to explain their services. These presentations will include time for the WIOA staff and the partner to discuss coordination of services. This will also allow us to create a very viable process for referrals.

Increase virtual services:

One of the things that we have learned in the short time we have been working with EDSI is that they are a very forwarding thinking workforce organization. They utilize various virtual services in their other WIB regions throughout the country. Due to this fact, we will be able to learn and glean from what they are already doing. They also have a very dedicated corporate staff that has worked hand-in-hand with us as they transition to our sub-recipient.

Improving technology:

South Central region is always looking for ways to improve the technology that we have available at our job centers and in our WIB office. We will continue to take advantage of any opportunities that might be presented to us.

When we do need to purchase computers, software, or other hardware, we use TechSoup to get substantial reduced prices for non-profit organizations. We recently were able to purchase DocuSign software and will utilize the product on both the admin and program sides.

Change in sub-recipients:

With board approval on April 26, 2022, South Central region went from two sub-recipients to one. This was effective with PY 22 starting July 1, 2022. This change was made due to two reasons: substantial cost savings on the administrative side and due to poor performance of the two previous sub-recipients.

3.(a) Section 6: A section explaining how the plan was developed, how it will be reviewed and modified on an ongoing basis, and the process for implementation if required;

This plan has been developed by the South Central WIB Executive Director through information obtained by requesting input from the Executive Committee and through conversations with various board members, WIB Staff, WIOA staff, CLEO's, and our sub-recipient EDSI.

The WIB Board, CLEO's and staff are fully aware of the fiscal issues that we are facing and are willing to do their part in making any tough decisions that might need to be made. Everything will be done in order that those decisions do not have to be made. We will continue to look for other revenue streams for South Central region.

We will continue to review this plan on a regular basis with the WIB Executive Committee, Full Board, CLEO's, and WIB staff. Our board is wanting to see our region move forward in making a difference in each of our 12 counties.

South Central Workforce Investment Region Consortium of Chief Local Elected Officials Agreement

The South Central Workforce Investment Region Consortium of Chief Local Elected Officials is organized exclusively to comply with the Workforce Innovation and Opportunity Act. The South Central Workforce Investment Region consists of more than one unit of general local government and therefore requires the creation of a consortium of Chief Local Elected Officials.

MEMBERSHIP

Membership shall consist of the Presiding Commissioner, the Chief Local Elected Official (CLEO), from each of the twelve counties in the South Central Workforce Investment Region. The counties of Butler, Carter, Douglas, Howell, Oregon, Ozark, Reynolds, Ripley, Shannon, Texas, Wayne and Wright make up the South Central Workforce Investment Region.

OFFICERS

The Consortium shall elect from its membership a Chairperson and a Vice-Chairperson. Elections shall be held in January of each year. Officers shall serve for a term of one year or until a successor is elected and may not serve consecutive terms in the same position. Vacancies shall be filled by election for the remainder of the unexpired term. The Chairperson shall preside, or arrange for another member, to preside at each meeting.

MEETINGS

Regular meetings shall take place on the fourth Tuesday of January, April, July and October of each year. All meetings of the Consortium shall comply with the Missouri Sunshine Law.

PARLIMENTARY AUTHORITY

The rules contained in the current edition of Robert's Rules of Order Newly Revised shall govern the Consortium in all cases to which they are applicable and in which they are not inconsistent with this agreement and any special rules of order the Consortium may adopt.

ROLES AND RESPONSIBILITIES

1. The Consortium shall receive board member nominations, if necessary, and appoint members to the Local Workforce Investment Board following the criteria in WIOA Section 107 (b) and any additional State Workforce Issuances or requirements.
2. The Consortium will work in partnership with the Local Board to:
 - (a) Develop and submit a local plan
 - (b) Conduct oversight for local youth workforce investment activities
 - (c) Negotiate and reach agreement on local performance accountability measures
 - (d) Select Operators and Providers
 - (e) Develop a local budget that is consistent with the local plan
3. The Consortium will be represented by at least one CLEO at one SCWIB Board Meeting during the Program Year.

4. The Consortium is liable for any misuse of the Workforce Innovation and Opportunity Act (WIOA) funds allocated to the South Central Workforce Investment Region. In the event of a disallowed cost, the liability would be distributed equally among the membership.

TERMS OF AGREEMENT

This Agreement shall be effective when signed by each member of the Consortium. This Agreement shall expire when there is any change in membership at which time a new Agreement shall be required. Any amendments to this Agreement must be approved by each member of the Consortium.

One-Stop Operator (OSO) Agreement

The One-Stop Operator (OSO) ensures that processes and systems are operating consistently within the Job Centers and across the region. As the One-Stop center requires multiple partners to deliver services on site, effective collaboration is essential.

The South Central One-Stop System and Program Manager must be both strategic and operational when working with all system partners. The following are the specific roles and responsibilities:

Strategic:

1. Interact with all WIOA and non-WIOA partners to design and implement a fully integrated service delivery system. This design must include the following system integrators' as specified in the MOU:

- a. Common data collection system, including customer satisfaction
- b. Information sharing
- c. Cross agency training/professional development
- d. Common referral system
- e. Workforce skill standards (common set of "work readiness" competencies")
- f. Common technology including an integrated platform (for data entry, portal, eligibility applications, etc.)
- g. Single point of contact, one system approach, for businesses to access services. This includes collaborating, recruitment and other business services on behalf of employers of all sizes and sectors.

2. Represent all of the partners in the system and be responsible for promoting and living the vision, mission and goals of the SCWIB.
3. Engage effectively in existing and newly developed WIB committees, taskforces, where appropriate and WIOA partnerships to transform the service delivery system.
4. Hold all WIOA required and non-required partners accountable to agreements that include but are not limited to the Memorandum of Understanding, Infrastructure Funding Agreement, and system wide commitments.
5. Understand and comply with WIOA, local, state, federal laws, policies, regulations, and guidance.

Operational:

6. in the development, implementation and oversight of standards/procedures/ protocol to ensure expectations and exceptional customer experience for job seekers, workers, and businesses are met throughout the system. This includes customer feedback and review system, a continuous quality improvement plan and professional development plan.
7. Establish and enforce shared customer service standards.
8. Ensure that the look and feel of the comprehensive center/partner affiliate sites and satellite sites are welcoming and accessible to all.
9. Be the first level point of contact for customer complaints. (The local customer complaint policy will guide the complaint and grievance proces.s)
10. Coordinate and facilitate operational conversations among partners to ensure a customer-centric and robust services delivery system. Be proactive in addressing partnership and system needs/issues.

11. Assist center and affiliate sites applying for certification within the system.
12. Evaluate the system to ensure compliance and Continuous Quality Improvement (CQI), develop, and oversee corrective action plans as appropriate.
13. Develop mechanism to track, validate and report to ensure that federal WIOA performance measures and WIB local system measures are met and/or are exceeded.
14. Ensure that all applicable federal, state and local policies and procedures are effectively communicated and carried out at all sites.
15. Provide reports to WIB Executive Director and CLEOs, system partners and other stakeholders at least quarterly or as requested.
16. Develop, implement, and oversee safety protocol at comprehensive center/partner affiliate and satellite sites.
17. Be the first line reviewer/approver of the use of Missouri Job Center brand by following brand and social media standards developed by the WIB and system partners. The Executive Director, on behalf of the WIB will provide final approval for all requested use of the brand.
18. Develop processes/protocol with partners to ensure that all South Central system sites have predictable operational hours, have sufficient staff coverage, have sufficient and operational equipment, etc.
19. Be able to take on other duties as they become necessary due to the evolution of WIOA and the system/network include but are not limited to:
 - a. Ensure the one-stop center and affiliates are delivering services that comply with WIOA regulations, SCWIB policy, and designed to **exceed** customer expectations.
 - b. Ensure the current customer satisfaction data collection system is fully implemented and utilized. Survey results should be provided to Executive Director quarterly or as requested.
 - c. Prepare the one-stop center for at least two (2) mandatory center monitoring evaluations per year. The full-service one-stop center and its affiliates will be subject to (a) one (1) monitoring evaluation conducted by the SCWIB's fiscal staff annually and (b) at least one (1) program monitoring visit conducted by the State funding agency and SCWIB annually.
 - d. Assist in the preparation of the centers to maintain One-Stop Job Center Certification every two (2) years.
 - e. Utilize technology to its fullest extent to enhance the customer's experience and to ensure efficient operations.
 - f. Provide original file documentation as requested by State funding agency and/or SCWIB.

The South Central Workforce System brings together a wide variety of Federal, State and local program partners, integrates the provision of their services and provides a full-range of assistance to job seekers and employers currently at two (2) full service one-stop centers.

Examples of the services provided at each of these sites include:

- Job-search and job-placement assistance
- Free access to computers, internet, fax machines and printers for job search purposes
- Access to job listings
- Labor market information
- Assistance in preparing resumes
- Comprehensive assessment of job skills, abilities, aptitudes and needs
- Career coaching
- Workshops on topics such as interviewing skills
- Case management
- Pre-vocational services
- Information on Unemployment Insurance
- Individual employment plans
- Referrals to training, education and related supportive services
- Outreach and recruitment for business
- Employer services

Under WIOA, mandated South Central Workforce System partners include the following (Section 121 (b)(1):

- WIOA Title I programs (Core partner)
- Wagner-Peyser programs (Core partner)
- Adult Education and Literacy programs (Core partner)
- Rehabilitation Act programs (Core partner)
- Family Support Division Programs (Core partner)
- Older Americans Act programs
- Perkins postsecondary vocational education activities
- Trade Adjustment Assistance and NAFTA-TAA programs
- Veterans Employment and Training
- Community Service Block Grant employment and training activities
- HUD employment and training activities
- Unemployment compensation programs
- Second Chance Act Programs

The primary role of the One-Stop Operator is to identify issues that need to be addressed that have to do with service delivery and performance. The One-Stop Operator works with partners to form acceptable solutions to issues.

- One-Stop Operator of each location will be responsible for the day-to-day supervision of Job Center staff and oversee local service delivery under the guidance of the Workforce Investment Board. The Workforce Investment Board has identified some key functions of staff that will apply to the South Central Region Missouri Job Centers:
- The One-Stop Operator is required to be on site at the comprehensive Job Center as necessary to ensure the standards set for the system are maintained.
- Staff members will engage job seekers to identify barriers to employment and refer them to Missouri Job Center services that will help address identified barriers.
- Job Center staff will deliver a variety of skill development and job seeking services for customers addressing their needs in the areas of training and employment. Services can be delivered one-on-one or in a group setting.
- Job Center staff will facilitate and deliver workshops and group sessions instructing customers on various skill development opportunities, including basic skills development, customer service, computer skills, job search skills, career readiness, and training enhancement options.
- Job Center staff will meet with customers to assist them in their job search efforts (resumes, interviews, internet job search, and other topics), assist job seekers in locating appropriate job openings, and assist individuals in applying for these jobs. Team members will also coordinate with the Job Center Manager in efforts to engage business and industry per hiring and training needs.
- Job Center staff will assist in maintaining a system to track, review, and analyze documentation of customer activities in the Missouri Job Center management information system, currently known as MoJobs.
- The Workforce Investment Board may also require the Job Center staff to perform other duties as deemed necessary.
- The One-Stop Operator must disclose any potential conflicts of interest arising from the relationships with training service providers or other service providers, including but not limited to career service providers.
- The One-Stop Operator must refrain from establishing practices that create disincentives to providing services to individuals with barriers to employment who may require longer-term services, such as intensive employment, training and education services.

- Comply with Federal regulations and procurement policies, relating to the calculation and use of profits.
- The South Central Missouri Region has elected to combine the One-Stop Operator and Staffing Contracts by Job Center region. The South Central Region is divided into two Job Center regions as follows: **West Plains Job Center** consists of Douglas, Howell, Oregon, Ozark, Texas and Wright counties; **Poplar Bluff Job Center** consists of Butler, Carter, Reynolds, Ripley, Shannon, and Wayne counties.
- The Contracting Agency/One-Stop Operator will demonstrate the objectives listed below:
 - Promote a cohesive team approach to the provision of services to customers.
 - Exhibit competent and cooperative management with a vision for staffing and supporting the Missouri Job Center system.
 - Demonstrate a commitment and ability to ensure that staff is customer service oriented and available to serve job seekers and employers.
 - Exercise a willingness to integrate resources and activities with other organizations.
 - Respond with flexibility in deploying human resources and an ability to adapt to change as economic conditions and operational needs evolve.
 - Survey for customer satisfaction.
 - Assist all partners to achieve the levels of performance expected of them by their funding source.
 - Provide all partners and staff with all information and communications needed for their optimal performance as part of the Job Center.
- The minimum hours of operation for each Missouri Job Center are 8:00 a.m. to 5:00 p.m., Monday through Friday. Job Center staff must maintain a work schedule of at least 40 hours per week.

- The Contracting Agency/One-Stop Operator is not required to provide staffing on state-recognized holidays and any other dates of closure as designated by the Governor. The current schedule is as follows:
 - New Year's Day
 - Martin Luther King, Jr. Day
 - Lincoln's Birthday
 - Washington's Birthday/President's Day
 - Truman's Birthday (observed)
 - Memorial Day
 - Juneteenth
 - Independence Day (observed)
 - Labor Day
 - Columbus Day
 - Veteran's Day
 - Thanksgiving Day
 - Christmas Day (observed)

- The One-Stop Operator and all parties/staff will sign and abide by the SCWIB Conflict of Interest policy.

- Prohibited Functions of the One-Stop Operator
 - Convene system stakeholders to develop the local plan
 - Prepare and submit the local plan
 - Conduct oversight over itself or its functions
 - Manage or participate in the competitive selection process of the one-stop operators
 - Select or terminate one-stop operators, career service providers, and youth providers
 - Negotiate local performance accountability measures
 - Develop and submit budgets for activities of the Local WIB

Equal Opportunity:

All program operators will follow the State of Missouri Nondiscrimination Plan. All staff will sign a form acknowledging their receipt and understanding of the Equal Opportunity is the Law and WIOA Grievance Procedure Notice forms. To learn more view EO Training at:

<https://jobs.mo.gov/files/equalopportunitytrainingvideo2018mp4>



416 Washington Avenue, West Plains, Missouri 65775 ❖ Phone 417-257-2630 ❖ Fax 417-257-2633 ❖ MO Relay 711

Fiscal Agent Agreement

The Chief Local Elected Official (CLEO) for the South Central Workforce Investment Board (SCWIB) designates the SCWIB Staff as the local Fiscal Agent for the South Central Region. This designation will be determined every two years when the CLEO By-Laws are reviewed or as CLEO determines a need.

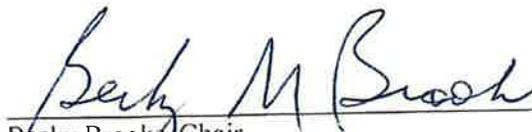
Designation of the fiscal agent does not relieve the CLEOs of liability for the misuse of grant funds. The CLEOs must ensure the SCWIB Staff has clearly defined roles and responsibilities. The fiscal agent is responsible for the following functions:

- Receive funds
- Ensure sustained fiscal integrity and accountability for the expenditures of funds in accordance with the Office of Management and Budget circulars (OMB), WIOA and the corresponding Federal Regulations and State Issuances
- Ensure all Financial policies and procedures adhere to OMB, WIOA, Federal Regulations and State Issuances
- Respond to audit financial findings
- Maintain proper accounting records and adequate documentation
- Prepare financial reports
- Provide technical assistance to sub-recipients regarding fiscal issues
- Procure contracts and/or obtain written agreements
- Conduct financial monitoring of service providers
- Ensure independent audit of all employment and training programs

There may be additional responsibilities determined by the CLEOs.

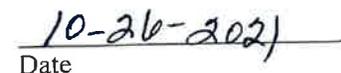

Zach Williams, Chair
South Central Region Chief Local Elected Official


Date


Becky Brooks, Chair
South Central Workforce Investment Board


Date


Donna Parrott, Executive Director
South Central Workforce Investment Board


Date

South Central Region JS Feedback Returns (7) Summary 7.12-17.2022



Dempsey, Steve <Steve.Dempsey@dhewd.mo.gov>

To Cathy Hicks; Cinthia Stator; Donna Parrott; Mooney, Sean; Taylor, Jennifer; Fuller, Tresa; Wallace, Wanda



South Central Region JS Feedback Returns (7) Summary 7.12-17.2022.pdf
320 KB



PY 2022-2023 STATEWIDE REGIONAL JSSI SURVEY RETURNS SUMMARY.xlsx
8 MB

South Central Region JSSI FYI...

This week's review covers Tuesday – Sunday (6 days).
Next week's review will be Monday – Sunday (7days).
Subsequent reviews will cover Tuesday – Monday (7 days).

Your JSSI Regional spreadsheet now includes PY '22.

Dashboards are next to be updated for PY '22.

Have a special JSSI "Request" for PY '22?
Write to steve.dempsey@dhewd.mo.gov



**REMEMBER TO THINK
"VOC"!**

To the South Central Region JSSI Team:

Your JS Feedback Activity for 7/12-17/2022

- **Recent VOC Feedback Returns:**
(07) – *several ..."-fuls" - Nice!*
- **July Returns**
(09)
- **PY '22 Total**
(19)
- **Cumulative Total**
(442)
- **Dashboard comparisons are soon to be prepared;
special requests are invited!**

Thank you for your JSSI support!

Steve | WPIWIOA JSSI Coordinator
Cell: 816-813-4912



Partner of americanjobcenter network

Sub-State Monitoring Plan

Issuance No: 01-2020-02

Effective Date: June 2022

Summary:

This local plan is developed in accordance with MDHEWD Issuance 11-2021 released on September 24, 2021. SCWIB will produce monitoring reports annually for Financial, Programmatic, One-Stop Operator, and Equal Opportunity compliance. Performance reviews and special initiatives/grants will be monitored quarterly or more often if necessary. These reports will be presented to the board on a regular schedule, recorded in the minutes, and be available to the public.

Background:

WIOA mandates administrative and program oversight responsibilities that, in partnership with the Chief Elected Official (CLEO), are inherent functions of the 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 outcomes under section 116."

Subparagraphs A(ii) and B above refer to WIOA local oversight responsibilities.

Further, the U.S. Department of Labor (DOL) implementing regulations for WIOA require:

"(a) Each recipient and subrecipient of funds under title I of WIOA and under Wagner-Peyser must conduct regular oversight and monitoring of its WIOA and Wagner-Peyser program(s) and those of its subrecipients and contractors as required under Title I of WIOA and Wagner-Peyser, as well as under 2 CFR Part 200, including 2 CFR 200.327, 200.328, 200.330, 200.331, and Department exceptions at 2 CFR part 2900, in order to:

(1) Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the Act and the regulations in this part;

(2) Determine whether there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations;

(3) Assure compliance with 2 CFR part 200; and

(4) Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of Section 188 of WIOA, including the Assistive Technology Act of 1998 (29 U.S.C. 3003)."

These regulations establish requirements under the Uniform Guidance for sub-state monitoring according to federal cost principles and audit requirements. This includes requiring an examination of subrecipient non-discrimination and conflict-of-interest policies, and mandatory disclosures of all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award.

Responsible Representative: The SCWIB Quality Assurance/EEO Compliance Officer will perform the oversight functions for the Performance, Programmatic, One-Stop Operator, and Equal Opportunity compliance. Financial Monitoring Review will be conducted by the Fiscal agent. These positions are employed directly by the board and have complete independence from the sub-contractors and report directly to the SCWIB Executive Director and the local workforce board.

Risk Assessment: Prior to issuing any award under WIOA Title I, SCWIB will conduct a risk assessment to assess the sub-recipient's overall ability to administer Federal funds as required under 2 CFR 200.205. This assessment will consider the sub-recipient's history regarding other grants, financial stability, quality of management systems and standards, history of performance, timeliness of compliance, ability to conform to terms and conditions of previous awards, reports and findings from audits, and their ability to implement effectively statutory, regulatory or other requirements. This will continually be monitored annually.

One-Stop Operator: SCWIB is required to conduct an annual review of the region's one-stop operator(s). This will ensure compliance with 20 CFR 678.620 as well as responsibilities outlined in the current MOU/RFP/contract. Oversight and monitoring are integral functions that ensure the one-stop operator's compliance with the requirements of WIOA, the activities per the Scope of Work, performance reporting requirements and the terms and conditions of the contract of agreement governing the one-stop operator. The One-Stop Operator Monitoring Tool, provided by OWD, will be utilized for this review. If it is determined that the one-stop operator is not meeting expectations, then corrective action must be taken. This can include contract termination. In the case of a conflict of interest, in that the SCWIB cannot effectively monitor itself, an outside entity or State agency will conduct the monitoring and report the results to the CLEOs.

Programmatic Monitoring: SCWIB staff will use random sampling to determine which files in every funding stream are to be reviewed during the program year. Files from the previous program year may be pulled to comply with sample size. This will be performed quarterly, and the results will be given to the sub-recipient for responses. At the end of the program year, the board and the sub-recipient will receive a final report of the cumulative program year results.

The funding streams include, Adult, Dislocated Worker, Youth, Disaster Relief grants, and other special grants that are given to the SCWIB to conduct by DHEWD where monitoring is required.

The random sample size will come from the state electronic case management system (MoJobs) and will include the following sample records at a minimum, depending on the universe to be reviewed.

Record Set Size	Sample Size
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

In cases when the universe is less than 69, 100% of the files will be reviewed.

When Adult and Dislocated Worker records are sampled, the two funding streams will be combined and reviewed for the following services:

1. Classroom Training
2. On-the-Job Training
3. Work experience/Internship/Apprenticeship
4. Supportive Services/Needs-related payments
5. Any other services that result in a direct payment to or on behalf of a participant

Participant records will be reviewed for:

1. Participant eligibility and priority for program and services received.
2. Orientation to services.
3. Signed acknowledgement from the participant that complaint and grievance rights and procedures was received
4. Justification for Individualized Career Services or Training services.
5. Method of assessment
6. Employment planning
7. Individual Training Accounts including all applicable paperwork/documentation
8. Work Based Learning including all paperwork/documentation
9. Appropriateness and accuracy of participant payments.
10. Appropriate data entry.
11. Posting of outcomes, including attainment of a degree or certificate, measurable skills gains, and any supplemental employment data.
12. Examination of historical change requests
13. Compliance issues cited in prior federal, state and local reviews
14. Determination if prior corrective measures have proven effective

Youth monitoring procedures must account for the following:

1. Out-of-School Youth (OSY) percentage expenditure requirement (which may adjust due to federal waivers)
2. 20% work-based learning with educational component requirement
3. 5% limit on In-School Youth enrolled with the "Requires additional assistance" barrier
4. 5% over-income exception

It will be ensured that the sub-recipient is meeting requirements set forth in the current MOU/RFP/Contract for carrying out programmatic duties. The SCWIB can make the determination to increase the sample size if other assessments and reviews of the sub-recipient(s) prove there is a risk factor.

Programmatic Monitoring Process: File reviews will be carried out periodically and reported to the One-Stop Committee and Board when it is deemed necessary for a determination of compliance with WIOA guidelines.

File review:

1. SCWIB monitor will pull WIOA enrollment report from MoJobs, create sample list for file review, and then send that list to the sub-recipient(s).
2. Next, the monitor will review the files and record comments and concerns, missing documents will be requested as needed.

3. The results of the initial review will be sent to the sub-recipient(s) for corrections and responses. The time limit for this will be 10 business days. Extensions can be granted with written permission that includes a justification.
4. The submitted responses will be checked for corrections.
5. A report will be submitted to the Executive Director of the SCWIB. This report may include findings, errors, recommended corrective action and/or training, and best practices.
6. The Executive Director will pass along any pertinent information to the one-stop and executive committee. The SCWIB will be notified as well.
7. Quarterly reports will be compiled in an annual report, and this will be shared with the one-stop committee and the SCWIB before the final board meeting of the program year. This final report will identify areas of noncompliance and corrective actions taken or required for improvement based on WIOA regulations. It will not include the comments and/or concerns that were cleared during the monitoring process, however, these will be available upon request. If a disallowed cost is identified during the sub-state monitoring, it will be reported to the SCWIB and CLEOs regardless of corrective actions that have been taken and/or resolved.

Data Element Monitoring: SCWIB must conduct a quarterly Data Element Validation (DEV) review of exited files to ensure the integrity of performance outcomes as required by 2 CFR 200.303. The DEV review will be preformed to conform to the state procedures complying with WIOA Section 116(d)(5)7 and federal guidance TEGL 07-18. This review is to verify that the performance data elements reported by Missouri are valid, accurate, reliable, and comparable across programs. The review is to identify anomalies in the data or missing date, to resolve issues that may cause inaccurate reporting, and to improve program performance accountability through the results of data validation efforts. The number of sample records to be reviewed will be downloaded from the system generated data element sheets in the Statewide case Management System. Staff will use the most recent PIRL document, OWD issuances, and TEGL 23-19 to validate the required elements. The Data Validation will be conducted after the 15th of each of these months-October, January April and July, within the program year. This will align with the end of reporting for the previous quarter. Elements that “fail” the data element review will have corresponding comments. This will show the element failure and the corrective action being taken to correct the data. This is not always possible since some records have reported out completely to DOL.

Data Element Monitoring Process: The DEV will be conducted quarterly after OWD has loaded the information to MoJobs and then notified SCWIB staff that it is ready to download. This information comes in the form of an excel spreadsheet with one participant’s information per tab after the instruction pages.

1. Staff will download the information and create the list. This will be sent to the sub-recipient(s).
2. Any hard copy files will be gathered for review in addition to accessing participant accounts on MoJobs.
3. The review will take place and the sub-recipients will be notified by email to make corrections when possible. All issues will be recorded in the comment section beside each element.
4. The final report will be submitted to OWD on the day that it was requested to be turned in by that office.

Any patterns of concern will be recorded, and training and guidance will be given to staff based on those findings.

Financial Monitoring Review (FMR): The SCWIB is required to perform quarterly Financial Monitoring Reviews (FMR) of the sub-recipient to ensure fiscal integrity. At least one monitoring per year must be on-site. Additional reviews may be warranted based on the evaluation of risk of noncompliance. The FMR will be performed to comply with WIOA section 184(a)(4)[29 U.S.C. 3244(a)(4)] annual OWD agreements and 2 CFR Part 200 and Part 2900.

The FMR will be conducted to ensure the adequacy of internal controls and the reliability of the sub-recipient's financial management system as they relate to the administrative subaward. The FMR must ensure the subrecipient meets the terms and conditions of the subaward and the fiscal goal or requirements, and that amounts reported are accurate, allowable, supported by documentation and properly allocated. In addition to WIOA grant fiscal activity the SCWIB fiscal monitor will also complete financial monitoring on stand-alone grants in the same manner according to their specific Scope of Work.

The FMR must include but is not limited to the reviews of the following process:

1. Audit Resolution/Management Decision
2. Financial Reports
3. Internal Controls
4. Source Documentation
5. Cost allocation/Indirect Costs
6. Cash Management
7. Procurement

Quarterly Monitoring will include:

1. Work Based Learning Timesheets
2. Individual Training account documents
3. Supportive Service invoices

FMR Process: Fiscal reviews will be carried out periodically and reported to the Executive Director and sub-recipient. The executive and one-stop operator committees may be notified when it is deemed necessary for a determination of compliance with WIOA guidelines. The quarterly reports will be compiled yearly and presented to the SCWIB before the last meeting of the program year.

1. The fiscal agent will determine a sample size to be audited
2. A notification or appointment will be set up with the sub-recipient for the auditing procedure and to allow documents to be gathered if necessary.
3. The fiscal agent will perform the audit using a fiscal monitoring tool and then record any comments, findings, best practices, recommend revisions of procedure to correct any issues noted.
4. The written report will be submitted to the program operator, along with any findings and/or recommendations. If there are findings, the program operator will be required to submit a corrective action plan to the Executive Director and Fiscal Officer within 14 business days after the report is received.
5. Final determinations will be reported to the executive committee and the SCWIB in a quarterly report and compiled together for a yearly report as well before the last meeting of the program year.

Corrective actions must be satisfactorily implemented within 3 months of the finding. If that is not possible, the sub-recipient must submit a written request for extension along with a justification to the SCWIB Executive Director. When it is known that the sub-recipient poses a risk, the fiscal monitoring process will be performed frequently until resolution. This will also be reported to the SCWIB as well.

Equal Opportunity Monitoring: The SCWIB is required to perform specific monitoring duties for equal opportunity. These activities include quarterly monitoring and yearly reports which are submitted to OWD.

Quarterly EO Monitoring includes, but is not limited to:

1. Ensuring compliance with the nondiscrimination and equal opportunity provisions of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan, and negotiating, where appropriate, with a recipient to secure voluntary compliance when noncompliance is found under §38.91(b).

2. Quarterly monitoring the compliance of recipients with WIOA section 188, 29 CFR Part 38 and the Missouri Nondiscrimination Plan, including a determination as to whether each recipient is conducting its WIOA Title I-financially assisted program or activity in a nondiscriminatory way. At a minimum, each annual monitoring review required must include:

i. A statistical or other quantifiable analysis of records and data kept by the recipient under §38.41, including analyses by race/ethnicity, sex, limited English proficiency, preferred language, age, and disability status.

ii. An investigation of any significant differences identified in paragraph (b)(1) of this section in participation in the programs, activities, or employment provided by the recipient, to determine whether these differences appear to be caused by discrimination. This investigation must be conducted through review of the recipient's records and any other appropriate means; and

iii. An assessment to determine whether the recipient has fulfilled its administrative obligations (for example, recordkeeping, notice and communication) and any duties assigned to it under the Missouri Nondiscrimination Plan

Basic EO Monitoring requirements that are reviewed and reported on an annual basis include, but are not limited to:

Monitoring and investigating the subrecipient's activities, and the activities of the entities receiving WIOA Title I-financial assistance on behalf of the subrecipient. Entities include contracted Service Providers (One Stop Operators, Adult/Dislocated Worker/Youth program providers), Eligible Training Providers (ETPs), On-the-Job Training (OJT) employers, Work Experience employers, and any other recipients defined under 29 CFR 38.4(zz). Monitoring is to ensure the recipient and its subrecipients are not violating their nondiscrimination and equal opportunity obligations under WIOA Title I, which includes monitoring the collection of data required in Section 188 of WIOA to ensure compliance with the nondiscrimination and equal opportunity requirements of Section 188 of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan which includes the following sections and elements;

i. Sections I: Assurances (29 CFR 38.25 through 38.27);

ii. Section II: Equal Opportunity Officers (29 CFR 38.28 through 38.33);

iii. Section III: Notice and Communication (29 CFR 38.34 through 38.39);

iv. Sections IV: Data and Information Collection and Maintenance (29 CFR 38.41 through 38.45);

v. Section V: Affirmative Outreach (29 CFR 38.40);

vi. Sections VI: Complaint Processing Procedures (29 CFR 38.72 and 38.73);

vii. Section VII: Governor's Oversight Responsibilities Regarding Recipients' Recordkeeping (29 CFR 38.51 through 38.53);

- viii. Additional Element Sections (29 CFR 38.54);
- ix. Element I: Review for Compliance under WIOA Section 188 with Policies/Contracts/Assurances;
- x. Element II: System to Ensure Compliance with WIOA Section 188 for Recipients;
- xi. Element III: A System for Reviewing Recipients' Contracts, Assurances and Other Agreements;
- xii. Element IV: Ensuring Compliance with WIOA Section 188;
- xiii. Element V: Compliance with Federal Disability Nondiscrimination Laws;
- xiv. Element VI: Training for Compliance under WIOA Section 188;
- xv. Element VII: Corrective Actions and Sanctions; and
- xvi. Element VIII: Supporting Documentation for the NDP.

Local EO Officers are responsible for monitoring small service providers (ETPS, OJTs, Work Experience employers only) defined under 29 CFR 38.4(hhh), which includes monitoring the small service provider for adopting and publishing complaint procedures and processing complaints, in accordance with Section 188 of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan. 2. Reviewing the recipient's written policies to make sure those policies are nondiscriminatory.

These monitoring's will be tracked on a spreadsheet and reported to the Executive Director and submitted to OWD when requested or on the required due date.

Additional Responsibilities: The SCWIB will ensure that business is conducted in an open and transparent manner, by making documents available to the public, on a regular basis through electronic mean and open meetings. The SCWIB must ensure that the website contains the following information:

1. Local Plan and modifications, if applicable
2. Board members and their affiliations
3. Selection of one-stop operators
4. Award of grants or contracts to eligible training providers of workforce investment activities including providers of youth workforce investment activities
5. Minutes of formal meetings of the SCWIB
6. Board by-laws, consistent with 20 CFR 679.310(g)

Monitoring Reports: The SCWIB (or designated local monitor) must submit annual reports for Financial, Programmatic, One-Stop Operator and EO monitoring each program year to their sub-recipient(s). Annual reports will be issues by June 30th of each program year. Each report will be addressed to the sub-recipient, include the date issued, the timeframe of monitoring, all identified issues, the corrective action, along with and explanation of the corrective action, and a deadline for completion of the corrective action. The previously mentioned reviews will be completed, and the following subjects will be included as well: adequacy of assessments, planning of activities and services, coordination with One-Stop Delivery System partners to meet the comprehensive needs of customers, and customer outcomes. The SCWIB will monitor any additional areas of concern during the program year to report back to the board. When issues are identified through monitoring, those issues will be resolved by prompt and appropriate corrective action. Reports will identify areas of noncompliance and corrective actions taken or required for improvement. The SCWIB will provide training and technical assistance when needed to assist the sub-recipient in becoming compliant with WIOA guidelines.

The following reports will be presented at a regularly scheduled SCWIB meeting:

1. One-Stop Operator monitoring
2. Programmatic monitoring
3. Financial Monitoring
4. Equal Opportunity monitoring
5. Performance reviews monitoring
6. Special initiatives/grants monitoring

Change of Sub-State Monitoring Plan: The current plan was created due to the release of OWD Issuance 11-2021 Sub-State Monitoring Policy and is subject to change when new issuances related to this subject are released in the future.