WORKFORCE INNOVATION AND OPPORTUNITY ACT

Monitoring Policy

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EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients and sub-recipients/subgrantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

South Central Oklahoma Workforce Board's Workforce Innovation and Opportunity Act Title I program funding statement can be found at https://SCOWB.info/funding

Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area
Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area
Jefferson County, Stephens County, and City of Duncan Labor Market Area

Monitoring Policy

PURPOSE: The purpose of this policy is to establish monitoring procedures that will comply with the requirements of the Workforce Innovation and Opportunity Act of 2014 (WIOA) as well as the state guidance offered in WSD# 03-2025.

- **BACKGROUND:** The Workforce Innovation and Opportunity Act , Public Law 113-128
- Single Audit Act (31 U.S.C. §§ 7501-7507)
- 2 CFR Part 200
- 20 CFR Part 677
- 20 CFR Part 683
- 2 CFR Part 2900
- 29 CFR Part 38
- TEN 11-24
- TEGL 05-24
- TEGL 15-14
- WSD# 03-2025

Definitions

Administrative Finding—A Finding is a violation of a specific compliance requirement contained in law; regulations; national policies; FOA; Uniform Guidance or OMB Circulars; the grant terms and conditions; ETA policy guidance, including Training and Employment Guidance Letters (TEGLs); and/or the grant agreement.

Area of Concern— An Area of Concern is used when there is a potential issue, challenge, or situation identified that does not yet violate one of the sources listed below, but left unchecked, could elevate to a finding or, at a minimum, negatively impact outcomes. Reports typically include a recommendation to address the situation at hand. Areas of concern are primarily for technical assistance purposes to prevent violations of:

a. Federal Law
b. Federal Regulations
c. Grant agreement
d. Contract agreement
e. Formal state or local policy

Desk Reviews—Reviews made during the monitoring process for the purpose of collecting and analyzing information and to support on-site reviews/monitoring. Desk reviews analyze existing data such as required monthly financial reports, vouchers, contracts, budgets, case management system data, and prior audits and monitoring reports.

Disallowed Costs—Disallowed costs under WIOA and Uniform Guidance include unallowable, unallocable, and unreasonable expenses.

Effective or best practice is a strategy, approach, process, or product in one or more key areas of implementation: governance, administration, service design and delivery, etc. that is sufficiently effective and/or innovative to warrant highlighting in the report.

Employee/client misconduct is considered as actions occurring during or outside work hours that reflect negatively on USDOL, the State of Oklahoma, or the WIOA program. Misconduct may include, but is not limited to, conflict of interest involving outside employment, business, and professional activities, the receipt or giving of gifts, fees, entertainment and favors, misuse of Federal property, misuse of official information and such other activities as might adversely affect the confidence of the public, as well as serious violations of Federal and State laws.

File Reviews—Reviews of a sample of participant's files to determine compliance with required federal, state, and local laws, policies, and procedures.

Finding—Noncompliance with policy, guidance or requested procedural steps.

Fraud, Misfeasance, Nonfeasance or Malfeasance Fraud—Misfeasance, nonfeasance or malfeasance should be considered broadly as any alleged deliberate action that is in violation of federal statutes and regulations. This category includes, but is not limited to, indications of bribery, forgery, extortion, embezzlement, theft of client checks, kickbacks from clients, intentional payment to a contractor or service provider without the expectation of receiving services, payment to ghost enrollees, misuse of appropriated funds, and misrepresenting information in official reports.

Gross Mismanagement/Gross Negligence is considered as actions or situations arising out of management ineptitude, oversight, or a disregard of the need to exercise reasonable care, leading to substantial violations of WIOA processes, regulation, or agreement/contract/grant provisions which could severely hamper the accomplishment of program goals. These include situations that lead to waste of government resources and could jeopardize future support for a particular project. This category includes, but is not limited to, non-auditable records, unsupported costs, highly inaccurate fiscal or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service, failure to carry out basic required functions, and the lack of good internal control procedures.

Misapplication of funds is considered as use of funds, assets, or property not authorized or provided for under WIOA regulations, grants, agreements, or contracts. This category includes, but is not limited to, nepotism, political patronage, use of clients for political activities, ineligible clients, conflict of interest, failure to report income from federal funds, violation of agreement/contracts/grant procedures, and the use of federal funds for other than specified purposes.

On-Site Reviews—The fundamental component of monitoring reviews, consisting of data collection techniques using formal monitoring guides. On-site reviews allow for the verification of items contained in the contract, grant agreement, or other items identified in the desk review.

Questioned Costs—Questioned costs are Federal funds expended in violation of provisions of the applicable laws, regulations, or award terms, or an expenditure that is not supported by adequate documentation to show that it is an allowable cost. Questioned costs also include what appear to be unreasonable costs, even if they are not specifically unallowable.

Report Observation—At the time of examination, the SCOWB Monitors may indicate key actions, processes, or items noticed or sampled. Observations are practices or processes that are particularly effective or efficient and/or may be replicated. These observations may also be ineffective or inefficient practices or processes that should be re-evaluated. These observations may also include questionable operational or business practices that must be noted for documentation purposes.

Substantial Violation is a severe violation of the provisions of WIOA Title I-B, which may include, but is not limited to, fraud, misfeasance, nonfeasance, malfeasance, misapplication of funds, gross mismanagement, gross negligence, failure to take corrective action, failure to meet performance goals in consecutive years, lack of sustained fiscal integrity, and failure to perform the duties required by the WIOA Act.

Sustained Fiscal Integrity means for the purpose of determining initial and subsequent local area designation, that the State/Grant Officer has not made a formal determination that either the grant recipient or any other entity charged with expending local area funds mis expended such funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the 2-year period preceding the determination.

Local Oversight and Monitoring Responsibilities

Assurances

SCOWB responsible for keeping the Oklahoma Employment Security Commission up to date with all relevant documents related to programs administered by OESC. These include plans, contracts, agreements, memorandums of understanding, grants, sub-grants, reports, and other applicable records.

At the beginning of each program year, SCOWB will review these documents and provide written confirmation to OESC that they have the latest versions. Any new documents, missing

documents identified by OESC, or updates to previously submitted documents will be forwarded electronically to OESC.

SCOWB will also provide OESC with all relevant documentation, case notes, and reports during monitoring activities. Monitoring reports and resolutions generated by subrecipients or SCOWB be submitted to OESC upon issuance.

SCOWB will include OESC on all distribution lists to ensure they receive official copies of regulations, changes to plans, contracts, MOUs, grants, subgrants, reports and records, and related correspondence. Copies of regulations, issuances, policies, procedures, reports, board minutes, and correspondence submitted by SCOWB to OESC will be signed and/or accompanied by signed cover letters attesting to official board approval.

Administrative Responsibilities

The South-Central Oklahoma Workforce Development Area is overseen by the South-Central Oklahoma Workforce Board. SCOWB is responsible for overseeing and monitoring activities funded by the Workforce Innovation and Opportunity Act and other federal grants. SCOWB is also required to monitor the Oklahoma Works American Job Center system and any subrecipients to ensure compliance with federal, state, and local policies, plans, and procedures.

SCOWB and COWIB as the fiscal agent responsibilities include:

1. Ensuring expenditures follow cost categories and limits outlined in WIOA and its regulations.
2. Confirming compliance with all applicable laws, regulations, and contracts.
3. Providing technical assistance where necessary and appropriate.

The Chief Local Elected Official in a local workforce area is liable for any misuse of any WIOA Title I funds (unless an agreement has been reached with the Governor to bear such responsibility). When the local workforce area is composed of more than one unit of general local government, the chief elected officials of such units may execute an agreement that specifies the respective roles of the individual CLEOs.

A. SCOWB and the Fiscal Agent will:

    1. Fiscal agent will ensure monitoring of service providers on an annual basis and at least sixty (60) days before their contract ends and submit monitoring reports and resolutions to the OESC WIOA Oversight Team when issued.
    2. Provide all requested documents to the OESC WIOA Oversight Team before the scheduled monitoring date.
    3. Make sure that documents required by the OESC for on-site review are organized and ready for examination.

4. Ensure appropriate staff are available on-site during monitoring to assist the OESC team.

B. SCOWB, as a LWDB, will monitor all service providers once per year per 2 CFR 200.504 and as required during contract period to verify compliance with:

1. Compliance with federal, state, and local area regulations, plans, policies, and guidelines, including:
    a. Participant eligibility verification documentation,
    b. Participant records for assessment and employability plan,
    c. Contracts such as on the job training, customized training, and worksite agreements.
    d. Proper delivery of WIOA Adult and Dislocated Worker services based on the LWDB's integrated service delivery design.
    e. Proper delivery of WIOA Youth services consistent with the LWDB's youth program.
2. Contract performance compliance, and
3. Compliance with local established policies.

C. COWIB, as Fiscal Agent, will submit to the OESC team a list of all contracts, including periods of service and a review plan, within 60 days after the program year begins (July 1 – June 30).

COWIB, as fiscal agent, is responsible for developing and enforcing specific policies, plans, and procedures which address the following:

1. Ensuring funds are spent in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Federal regulations, and State policies.
2. Preparing and managing contracts and ensuring compliance.
3. Addressing financial findings from monitoring.
4. Maintaining proper accounting records and documentation.
5. Preparing financial reports.
6. Providing technical assistance to subrecipients on fiscal issues.
7. Procuring contracts and/or written agreements.
8. Disbursing funds for salaries, contracts, wages, and vouchers.
9. Conducting continuous financial oversight and monitoring of the board staff and service providers for compliance with federal cost principles.

a. Fiscal agents may accomplish these responsibilities through a combination of routine review of invoices prior to payment with federal grant funds and periodic on-site reviews of LWDB and service provider financial records. Fiscal agents must submit copies of all monitoring reports and resolutions to the OESC WIOA Oversight Team when issued.

10. Ensuring independent audits of all contracted entities receiving one million dollars ($1,000,000.00) or more in DOL grant funds (A Non-Federal entity that expends $1,000,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted). In instances where the nine-month audit submission deadline creates an undue burden, contracted entities may request an extension. The written request for an extension must include:
    a. Recipient name;
    b. Award number;
    c. Recipient audit period;
    d. Justification for the extension;
    e. New proposed date for the report submission; and
    f. A corrective action plan to ensure that future reports will be filed timely.
11. Ensuring funds are being expended according to the LWDB-developed and CLEO approved budget.

SCOWB Monitoring Policy and Procedures

Purpose

The South-Central Oklahoma Workforce Board (SCOWB), establishes this policy to ensure compliance with federal, state, and local administrative and financial requirements, policies, and procedures, and to ensure performance goals are achieved. This policy outlines the roles, responsibilities, and procedures for monitoring Department of Labor (DOL)-funded programs and the delivery of integrated services.

Roles and Responsibilities

SCOWB: The SCOWB is responsible for the overall governance, oversight, and strategic direction of monitoring activities with the South-Central Oklahoma Workforce Development Area.

SCOWB Staff: The LWDB staff are responsible for executing and managing day-to-day monitoring activities, ensuring operational compliance, and supporting subrecipients and service providers.

Fiscal Agent: The fiscal agent ensures proper financial management, accountability, and compliance with federal, state, and local fiscal regulations.

Service Providers/Subrecipients: Service providers and subrecipients are responsible for implementing WIOA-funded programs and maintaining compliance with federal, state, and local fiscal regulations.

SCOWB Monitoring Activities

SCOWB will conduct the following types of monitoring:

- Programmatic Monitoring
  - Assess compliance with WIOA program requirements, including participant eligibility, service delivery, and performance outcomes.
  - Review participant files for accuracy and completeness.
  - Assess core performance measures.
- Fiscal Monitoring (COWIB):
  - Evaluate financial management systems, including internal controls, cash management, and cost allocation.
  - Review expenditures to ensure they are allowable, allocable, and reasonable.
  - Verify adherence to procurement standards and contractual terms.
- Contract Monitoring
  - Assess contract performance, compliance, deliverables, and outcomes.
- System Monitoring
  - Review of the AJCs and One-Stop System
  - Evaluation of the MOU/ IFA and partner relations.
  - Compliance with equal opportunity and grievance and complaint policies and procedures.

Monitoring Scope & Schedule

Programmatic Monitoring

Activity	Scope	Frequency
Adult/ Dislocated Worker	A minimum 25% of new enrollments shall be monitored. Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment and individual employment plan and other items.	1st & 3rd Quarter

Youth	A minimum 25% of new enrollments shall be monitored. Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment and individual service strategy and other items.	1st & 3rd Quarter
On-the-Job Training	Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, OJT contracts, worksite monitoring and other items.	100% (Active not previously monitored)
Work Experience	Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, WEX contracts, worksite monitoring and other items.	100% (Active not previously monitored)
Incumbent Worker	Monitoring of eligibility, participant eligibility verification documentation and employer eligibility. Verification of payments to employer.	100% (Active not previously monitored)
Supportive Services	Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, and supportive service documentation.	Annually 2nd Quarter
Incentives	Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, and incentive verification & documentation.	Annually 2nd Quarter

Occupational Skills Training	Monitoring of eligibility, participant eligibility verification documentation, data validation, priority of services, assessment of individual service strategy and/or individual employment plan, in-demand occupation, eligible training provider & program, verification of training documentation, and invoice and payment review.	Annually 3rd Quarter
Core Performance Indicators	Ensure the Service Provider is meeting all state performance expectations.	Quarterly

Fiscal Monitoring

Activity	Scope	Frequency
Procurement and Contract Compliance	COWIB is responsible for monitoring of all contracts. Verifying that the contracts are within compliance and are properly procured.	As needed to meet needs for RFPs and Contracts
Invoice Review	Routine review of invoices prior to payment with federal grant funds. The SCOWB Monitor, for which COWIB is the fiscal agent, is responsible for reviewing their invoices and signing off on payment.	Monthly
Subrecipient Review	COWIB will monitor each subrecipient providing services to participants for program accountability and to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.	Once annually, and no less than sixty (60) days prior to the expiration date of the contract.
Single Audit	To be completed annually by an outside entity that was competitively procured by COWIB	Annually

Contract Monitoring

Activity	Scope	Frequency

Performance	Monitoring service providers on their contractual performance to ensure measures are met.	Monthly

System Monitoring

Activity	Scope	Frequency
System & Service Delivery	Review of the AJCs and the system to include partner relations, referral processes, MOU and IFA, customer satisfaction, Equal Opportunity, One Stop Operator, etc.	Annually

Monitoring Methods

SCOWB's approach to monitoring uses a combination of methods, including:

- Desk reviews of reports, policies, and documentation.
- On-site visits to service provider locations.
- Interviews with staff, participants, and stakeholders.
- Sampling of participant files, financial records, and other documentation.

While these are the primary methods, SCOWB may use additional techniques as necessary to ensure comprehensive oversight. Participant files, documentation, and other records will be reviewed both virtually and on-site using tools such as the Virtual Case Management System.

Reporting

Exit Conference

Upon the completion of the monitoring review, an exit conference will be conducted to discuss any preliminary issues or potential findings. The participants in the exit conference may include SCOWB's Monitor, representatives from the Service Provider, and other relevant stakeholders as needed. The purpose of the conference is to ensure transparency, provide an opportunity for clarification, and discuss possible corrective actions.
Following the exit conference, the SCOWB Monitor will prepare a brief written summary of the issues discussed. This synopsis will be provided to the Service Provider for reference and further consideration.

Monitoring Report

A comprehensive written report summarizing the results of the monitoring review will be prepared by the SCOWB Monitor as soon as possible after the on-site review, typically within 30 days. The report will provide a detailed analysis of the review and may include the following components:

1. **Scope and Purpose of the Review:**

- A clear statement of the objectives and the areas or programs reviewed.

2. **Monitoring Methods:**
   - A description of the techniques and tools used during the review, such as file sampling, interviews, site inspections, and system reviews.
3. **Service Provider Strengths:**
   - A summary of exemplary practices or strengths identified during the review, with consideration for their potential promotion as best practices across the state.
4. **Findings of Non-Compliance:**
   - A detailed summary of any instances of non-compliance, including citations of the applicable policies, procedures, rules, regulations, or laws.
5. **Monitoring Observations:**
   - Observations that may not constitute formal findings but are worth noting for awareness or improvement.
6. **Suggestions for Program Improvements:**
   - Recommendations to enhance service delivery, improve compliance, or address gaps in current processes.
7. **Required Corrective Actions:**
   - Specific actions the Service Provider must take to address identified findings, with deadlines for implementation and resolution.

Detailed Findings of Non-Compliance

Each finding of non-compliance will include the following information:

1. **Compliance Requirement:**
   - A detailed description of the specific requirement that was not met, along with a citation of the relevant policy, rule, regulation, or law.
2. **Method of Determination:**
   - An explanation of how the deficiency was identified, such as through:
     i. Observation of program activities.
     ii. Review of records in the online case management system.
     iii. Examination of program documentation.
     iv. Interviews with customers or Service Provider staff.
3. **Extent of Non-Compliance:**
   - Quantification of the deficiency, wherever possible, to illustrate the scale of the issue. For example:
     i. “Six out of 15 participant files sampled did not include the required documentation.”
4. **Cause(s) of Non-Compliance:**
   - An analysis of the underlying cause(s) of the issue, when identifiable, to support corrective actions and prevent recurrence.

Monitoring Report Responsibilities and Distribution

Activity	Responsible Staff	Type of	Distributed To

		Report	
Programmatic Monitoring	SCOWB Monitor	• Written	• Service Provider • SCOWB Executive Director
Fiscal Monitoring	COWIB	• Written	• Service Provider • SCOWB Monitor • SCOWB Board Chair, as appropriate • SCOWB Board, as appropriate • Chief Local Elected Official, as appropriate • OESC WIOA Oversight Team
Contract Monitoring	COWIB	• In-Person/ Virtual Meeting	• Service Provider • SCOWB Executive Director • COWIB CEO
System Monitoring	SCOWB Monitor	• In-Person • Written	• Service Providers • Center Managers, as appropriate • OESC Regional Manager, as appropriate • System Partners, as appropriate • OESC WIOA Oversight Team

Corrective Actions

An Official Report shall be provided to the appropriate party upon completion. Those receiving the report from Board Staff shall have 14 calendar days to respond. Observations will not require a response; however, areas of concern and findings would necessitate a response from the appropriate party. The appropriate party shall have 2 attempts to address all issues found with the report or have a plan in place for a resolution that has been approved by the SCOWB Executive Director. A Final Determination Report will be issued at the end of the corrective action process. Further responses may be allowed at the discretion of the SCOWB Executive Director. If parties reach an impasse and are not able to resolve an issue, the SCOWB determination shall stand and the service provider has the option to submit a grievance through the SCOWB Grievance Policy.

Follow Up

Appropriate SCOWB Monitoring Staff shall conduct follow-up monitoring on those deficiencies

which have been addressed in the monitoring report within a reasonable amount of time, to ensure that proper corrective actions have been taken. Persistent or unresolved issues may result in further action, including technical assistance, additional monitoring, or termination of contracts.

Appeals Process

If the service provider/subrecipient disagrees with the final determination, they have 15 days from receiving the determination to request an appeal or 2 business days after an informal resolution conference. Once the appeal is received, the SCOWB Policy and Compliance Manager will review it and schedule a hearing within 30 days, unless all parties agree to extend the deadline for additional negotiations. In some cases, the SCOWB Executive Director can waive the hearing requirement if immediate action is necessary.

During the hearing, the service provider/ subrecipient must provide evidence showing that they complied with all applicable laws, regulations, and policies. The decision from the SCOWB, issued within 30 days after the hearing record is closed, is final and binding.

Any costs associated with legal assistance, accounting, or representation during the appeal cannot be covered by grant or contract funds received from SCOWB. This includes costs for experts, accountants, or attorneys.

Support Documentation

Support documentation may be requested from the Service Provider from time to time to validate responses to correct actions. In providing the support documentation each supporting document shall have the issue number identified on the report and the appropriate participant identification number of the participant for which the documentation is referencing.

Technical Assistance

The SCOWB Service Provider or One-Stop Partner may request technical assistance from the SCOWB by making a request in writing to the SCOWB Executive Director. The request should describe the type of assistance requested. The SCOWB Executive Director will reply to any such request after considering the SCOWB's priorities and available resources.

Addenda / Revisions

The SCOWB Executive Director is authorized to issue additional instructions, guidance, approvals, and/or forms to further implement the requirements of policy, without making substantive change to the policy, except in situations when a new or updated state and federal

guidance is issued.

ACTION REQUIRED: SCOWB will disseminate the Monitoring Policy to all SCOWB contractors, staff, and board members. All contractors, staff, and board members will be responsible for following this policy.

APPROVED: 05/13/25

WIOA ADULT PARTICIPANT FILE REVIEW

Case Manager: American Job Center:

Participant Name: Participant ID:

Eligibility	Y	N	Documentation/Comments
18 years or older			BC ☐ License ☐
Low income (priority)			TANF ☐ Welfare ☐ SNAP ☐ SSI/A ☐ SP ☐ Other ☐
Selective Service Registration			N/A ☐ Number:
Citizenship/Work Eligible			SSC ☐ BC ☐ Resident Alien Card ☐ Other ☐
Basic Skills Deficient (priority)			
Employment Status at Participation			Unemployed ☐ Unable to find Employment ☐ Employed but determined eligible by AJC (exception) ☐
Other Participant Information			
Veteran			Campaign ☐ Disabled ☐ Recently Separated ☐ Eligible Spouse ☐ Received DVOP Service ☐
Individual w/ a disability			
Offender			
UI Claimant			UI profiled ☐
Required Documentation			
Signed Application			
Grievance/Appeal/EEO			Grievance ☐ EEO ☐
Signed Information Release Form			
Co-Enrollment			
Referred by partner program			

Co-enrolled in another program			WIOA DW ☐ TAA Program ☐ W-P ☐ Other:
TAA Program eligible			

Co-Enrollment (continued)	Y	N	Documentation/Comments
Received W-P services			Dates of W-P services:
Received other program services			Program:
Basic Career Services Received			
Eligibility determination			
Orientation			
Initial assessment			
Referrals to partner programs			WIOA DW ☐ TAA Program ☐ W-P ☐ VR ☐ ABE ☐ Other ☐
Job Search/Placement			
Provision of Performance Inform. on ETPs			
LMI (job vacancies, in-demand, occupational skills)			
Supportive Services			Evidence they were offered/available ☐ Services received:
Financial aid for training			
UI claims processing help			
Individualized Career Services Received			
Comprehensive assessment			
IEP			
Group/individual counseling or mentoring			
Career planning/case management			

Pre-vocational services			
Internships and work experience			
Workforce preparation activities			
Financial literacy services			
Out of area job search/relocation assistance			
English acquisition			

Training	Y	N	Documentation/Comments
Received			Provider: Dates of Training:
Training Approval Documentation			
Training Eligibility			Unlikely/unable to obtain/retain employment at self-sufficiency wage ☐ In need of training to obtain/retain employment at self-sufficiency wage ☐
ITA			
Contract			OJT ☐ Insufficient ETPs ☐ CBO ☐ Higher education ☐ Pay-for-performance ☐
Work-based			Registered Apprenticeship ☐ Incumbent worker ☐ Transitional jobs ☐
Classroom			GED/HiSET ☐ ESOL ☐ Other:
Linked to local market			LMI proof provided Y ☐ N ☐
Attendance/Grades/Updates			Attendance ☐ Grades ☐ Progress Report ☐
Vendor on ETPL			Documentation provided: Y ☐ N ☐
In-Demand Occupation			
Degree/certificate/diploma			Degree ☐ Certificate ☐ Diploma ☐ Date:
Received Needs Related Payments?			
Results at Exit			
Exit Date			

Employed			N/A ☐ Employer: Date of Employment: Quarter after exit: Employment related to training: Y ☐ N ☐ N/A ☐
Credential			N/A ☐ Credential type:
Results at Exit (continued)	**Y**	**N**	**Documentation/Comments**
Earnings Gain			Previous salary: Current salary:
Wage Data Follow-up *Note: if entered unsubsidized employment, F/U required for 12 months			Type of follow-up: Frequency:
Last date of contact			
Additional Comments:			
Problems with file:			

WIOA DW PARTICIPANT FILE REVIEW

Case Manager: American Job Center:

Participant Name: Participant ID:

Eligibility	Y	N	Documentation/Comments
Dislocation Event			Permanent Dislocation ☐ Natural Disaster ☐ Permanent Closure ☐ Substantial Layoff ☐ Displaced Homemaker ☐ Previously self-employed ☐
Dislocation Employer			Employer: Layoff Date:
Eligibility criteria			Unlikely to return ☐ Previous attachment to workforce ☐
Selective Service Registration			N/A ☐ Copy in file ☐
Citizenship/Work Eligible			SSC ☐ BC ☐ Resident Alien Card ☐ Other ☐
Participant Information			
Veteran			Campaign ☐ Disabled ☐ Recently Separated ☐ Eligible Spouse ☐ Received DVOP Service ☐ N/A ☐
Individual w/ a Disability			
Offender			
UI Claimant			UI profiled ☐
Required Documentation			
Signed Application			

Grievance/Appeal/EEO			Grievance ☐ EEO ☐
Signed Information Release Form			
Co-Enrollment			
Referred by partner program			
Co-enrolled in another program			WIOA Adult ☐ TAA Program ☐ W-P ☐ Other:
TAA Program eligible			

Co-Enrollment (continued)	**Y**	**N**	**Documentation/Comments**
Received W-P services			Dates of W-P services:
Received other program services			Program:
Basic Career Services Received			
Eligibility determination			
Orientation			
Initial assessment			
Referrals to partner programs			WIOA DW ☐ TAA Program ☐ W-P ☐ VR ☐ ABE ☐ Other ☐
Job Search/Placement			
Provision of Performance Inform. on ETPs			
LMI (job vacancies, in-demand, occupational skills)			
Supportive Services			Evidence they were offered/available ☐ Services received:
Financial aid for training			
Individualized Career Services Received			
Comprehensive assessment			
IEP			
Group/individual counseling or mentoring			

Career planning/case management			
Pre-vocational services			
Internships and work experience			
Workforce preparation activities			
Financial literacy services			
Out of area job search/relocation assistance			
English acquisition			

Training	Y	N	Documentation/Comments
Received			Provider: Dates of Training:
Training Approval Documentation			
Training Eligibility			Unlikely/unable to obtain/retain employment at self-sufficiency wage ☐ In need of training to obtain/retain employment at self-sufficiency wage ☐ Has skills/qualification to successfully participate in selected program ☐
ITA			
Contract			OJT ☐ Insufficient ETPs ☐ CBO ☐ Higher education ☐ Pay-for-performance ☐
Work-based			Registered Apprenticeship ☐ Incumbent worker ☐ Transitional jobs ☐
Classroom			GED/HiSET ☐ ESOL ☐ Other:
Linked to local market			LMI proof provided Y ☐ N ☐
Attendance/Grades/Updates			Attendance ☐ Grades ☐ Progress Report ☐
Vendor on ETPL			Documentation provided: Y ☐ N ☐
In-Demand Occupation			
Degree/certificate/diploma			Degree ☐ Certificate ☐ Diploma ☐ Date:
Received Needs Related Payments?			
Results at Exit			
Exit Date			

Employed			N/A ☐ Employer: Date of Employment: Quarter after exit: Employment related to training: Y ☐ N ☐ N/A ☐
Credential			N/A ☐ Credential type:
Results at Exit (continued)	**Y**	**N**	**Documentation/Comments**
Earnings Gain			Previous salary: Current salary: Type of follow-up: Frequency:
Follow-up *Note: if entered unsubsidized employment, F/U required for 12 months			
Last date of contact			
Additional Comments:			

WIOA YOUTH PARTICIPANT FILE REVIEW

Case Manager: American Job Center:

Participant Name: Participant ID:

Eligibility	Y	N	Documentation/Comments
Age/DOB			BC ☐ License ☐ Other ☐ DOB:
Parental consent (if minor)			
Eligibility Basis: OSY			16-24 ☐ AND ○ School dropout ○ Youth within age of compulsory school attendance but hasn't attended school for at least the most recent complete school year calendar ○ Recipient of secondary diploma/equivalent who is low-income and is BSD or ELL ○ An individual who is subject to the juvenile or adult justice system ○ Homeless ○ Pregnant or parenting ○ Has a disability ○ A low-income individual who requires additional assistance
Eligibility Basis: ISY			14-21 ☐ AND Low Income ☐ OR 5% non-low-income exempt ☐ AND ○ BSD ○ ELL ○ An offender ○ Homeless ○ Pregnant or parenting ○ Has a disability ○ A low-income individual who requires additional assistance

Low income documentation			Public Assistance ☐ Below Poverty Level ☐ Food Stamps ☐ Homeless ☐ Foster Child ☐ Disabled ☐
Selective Service Registration			N/A ☐ Number:

Eligibility (continued)	Y	N	Documentation/Comments
Citizenship/Work Eligible			SSC ☐ BC ☐ Resident Alien Card ☐ Other ☐
Veteran			Eligible Spouse ☐ Received DVOP Service ☐ Campaign ☐ Disabled ☐ Recently Separated ☐
Required Documentation			
Signed Application			
Grievance/Appeal/EEO			Grievance ☐ EEO ☐
Signed Information Release Form			
Program Elements Offered/Received			
Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent			
Alternative secondary school services, or dropout recovery services			
Paid and unpaid work experiences that have as a component academic and occupational education (summer employment, pre-apprenticeship, internships, job shadowing, OJT)			
Occupational skill training			
Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster			
Leadership development opportunities			
Supportive services			
Adult mentoring (12+ months)			
Follow-up services (12+ months)			
Comprehensive guidance and counseling			
Financial literacy education			
Entrepreneurial skills training			
LMI on in-demand industries/occupations			
Postsecondary education and training transition preparation			
Key Dates			
Eligibility Determination			
Assessment			

Credential			
Entered Employment			
Exit			
Program Participation Type			Summer Youth ☐ Year-Round Program ☐
Assessment	**Y**	**N**	**Documentation/Comments**
Academic Assessment			Test type: Date: Math: _____ Reading:
Aptitudes Assessment			Self-assessment ☐ Test ☐ Resume ☐ Other:
Competencies, Interests			Application ☐ Work history ☐
Assessment of Barriers			Describe:
Ongoing Assessment			
Service Integration			
Referred to American Job Center			
Referred to partner program			Program:
Received W-P services			Dates of W-P services:
ISS/IEP Development			
Present, and signed			Signed by participant ☐
Chronological Dates			
Is it a 'living document?'			
ISS Review/Updating			Frequency: 1x/wk ☐ 2 wks ☐ monthly ☐ 3 mo ☐ never ☐
Short & Long-term goals			
Goal #1: _____			Type: Date Set: Date Attained:
Goal #2: _____			Type: Date Set: Date Attained:
Goal #3: _____			Type: Date Set: Date Attained:
Basic and Individualized Services			
Date of 1st Youth Service			

Comprehensive Assessment			
Services received			
Job search/referrals			Number of Jobs:
Supportive Services			Evidence they were offered/available ☐ Services received:
Training	**Y**	**N**	**Documentation/Comments**
Received			N/A ☐ Dates of Training:

Training (continued)	Y	N	Documentation/Comments
Training Approval Documentation			
Classroom			GED ☐ ESOL ☐ Other:
OJT			
ITA			
Skills Necessary			
Linked to local market			LMI proof provided Y ☐ N ☐
Attendance/Grades/Updates			Attendance ☐ Grades ☐ Progress Report ☐
Vendor on ETPL			Documentation provided: Y ☐ N ☐
In-Demand Occupation			
Degree/certificate/diploma			Degree ☐ Certificate ☐ Diploma ☐ Date:
Results at Exit			
Exit Date			
Employed			N/A ☐ Employer: Date of Employment: Quarter after exit: Employment related to training: Y ☐ N ☐ N/A ☐
Credential			N/A ☐ GED ☐ Credential type:
Earnings Gain			Previous salary: Current salary:
Wage Data			
Follow-up			Type of follow-up: Frequency:
Last date of contact			
Follow-up done for 12+ months			
Additional Comments:			