

# Monitoring WIA Youth Contracts

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Why are youth contracts monitored? The main reason is to determine whether those receiving Workforce Investment Act (WIA) funds are complying with the provisions of their contracts and with applicable state and federal regulations. Other reasons include

- To ensure that goals are being met and WIA laws and regulations are being adhered to
- To ensure that the contractor meets minimum standards
- To verify that services are being provided in accordance with the contract
- To determine that the amounts claimed for reimbursement are substantiated
- To ascertain that participants are achieving necessary outcomes

WIA youth programs are monitored to improve their performance, identify potential problems, evaluate performance controls, ensure that finances are adequately documented, provide qualitative observations and data on performance, and provide information on the impact of WIA services.

## Monitoring Activities

To determine whether provisions of a contract are being met, a contract monitor may conduct site visits, examine program operations, review beneficiary and trainee eligibility, and review outcomes and quality of training being provided. Investigations may include examining records and case files, questioning employees, interviewing clients, and visiting sites where any WIA program or activity is conducted or records of participants are kept. Contract monitors may also review employer records to assure that participants are receiving proper wages. They may make a work site visit to ensure that participants are employed in the agreed upon position, at the appropriate wage, utilizing the skills obtained through training.

## Monitoring Timeline

Monitoring is an ongoing process. Desk reviews should be done as invoices and monthly narratives come in. Risk assessments are done to see if there is a need to dig deeper.

Formal monitoring should occur at least annually to ensure compliance and so that problems can be identified and resolved as soon as possible. Contractors should be in regular contact with their contract monitors to report any concerns and problems that may arise between site visits.

## Noncompliance

Failure to comply with WIA law and regulations may result in corrective action or the imposition of sanctions. Contract monitors may

- Issue a notice of intent to revoke approval of all or part of the contract affected
- Require corrective action to secure prompt compliance
- Outline corrective action, including a time schedule
- Monitor implementation of corrective action

## Contract Monitor Responsibilities

To ensure compliance with the requirements of the contract, contract monitors are responsible for

- Inspecting and certifying acceptability of services in terms of quantity, quality, timeliness, and cost
- Making sure that the contractor knows
  - That the contract covers only charges for items specifically included in the contract
  - That unused funds and the need for additional funds must be reported
  - That the supervisor will be informed or consulted when performance is not satisfactory or problems are anticipated and when changes to the contract are proposed

Contract monitors may perform these tasks.

- Review and approve reports
- Notify those responsible if items are to be rejected and state the basis for rejection
- Provide complete and timely progress reports
- Certify invoices for payment
- Keep records of performance and notify those responsible in writing if they are not satisfactory or if problems are anticipated
- Provide copies of correspondence relating to contract issues between the monitor and the contractor to those responsible
- Prepare memoranda covering meetings and discussions between the monitor and the contractor
- Recommend changes in the contract with justification for the proposed change
- Ensure that changes in the contract are not implemented before written authorization or a contract modification is issued
- Make site visits to the contractor's facility and check contractor performance regarding
  - Actual performance versus scheduled and reported performance
  - Changes in performance that affect the contractor's financial status, create personnel or labor difficulties, or overextend facilities
  - Verification that the employees charged to the contract are actually performing work under the contract
- Ensuring notification of any anticipated overrun or underrun of the estimated cost under cost-reimbursement contracts
- Preparing requests to fund each contract phase, obtain additional funding if necessary, and exercise the option to extend the period of performance to ensure successful completion of the expert's services
- Conferring with the contractor to determine whether the contractor intends to exercise an option to increase his or her hourly rates

### Areas of Monitoring

Contract monitors will typically look at all aspects of contract fulfillment including

- Administration
  - Evaluate compliance with terms and conditions included in the contract
  - Include compliance with insurance and licensing requirements
- Fiscal activities
  - Evaluate compliance with fiscal requirements
  - Review the contractor's invoices
  - Verify that costs being reimbursed are documented, reasonable, and allowable
  - Verify separation of funds if agency operates under more than one contract
  - Compare budgets to the actual costs
- Program implementation
  - Review the service provisions of the contract to determine what the contractor is to provide and the desired quality
  - Determine whether the agency is delivering agreed upon services
  - Evaluate the quality and timeliness of services
  - Interview staff and others to determine if the services are being performed according to the contract
  - Conduct on-site reviews to check the nature and quality of the services being provided

## Preparation for Monitoring

To prepare for a monitoring visit, review your contract for provisions that might be monitored and enter those activities on chart that indicates

- Responsibility
- Due date
- Completion date

Preparation for Monitoring			
Contract Provision	Responsibility	Due Date	Completion Date
Administration			
Fiscal activities			
Program implementation			

When reviewing contractors' performance, contract monitors will look for issues like those in the checklist below.

Monitoring Checklist		
Issue	Yes	No
Are contract requirements being met?		
Is prescribed corrective action being taken?		
Are Common Measures quotas being met?		
Are short-term and long-term outcomes being met?		
Are minimum standards being met?		
Are services being provided in accordance with the contract?		
Are participants achieving necessary outcomes?		
Are amounts claimed for reimbursement substantiated?		
Are WIA laws and regulation being adhered to?		
Does the contractor provide . . .		
Data on participant outcomes?		
Data on changes in participant knowledge, skills, attitude, or behavior?		
Documentation of an evidence-based approach?		
Anecdotal reports from participants and staff?		
Literature documenting a sound underlying principle (no hard data but based on principles that have been proven effective)?		
Data documenting participant satisfaction with the program or activity?		
Other evidence, with a full explanation of how the evidence demonstrates effectiveness?		

Contract monitoring can be easy or stressful for a contractor. If good records are kept, if contract provisions are adhered to, and if WIA laws, regulations, and policies are followed, the process will be much easier.

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