Attachment 7

COMPLIANCE MONITORING PROCEDURES FOR PER-CLIENT EXPENDITURES & ITA AND SUPPORTIVE SERVICES AWARDS

Workforce System Specialists (SWLs) will be monitoring per-client expenditures to identify supportive and training services in amounts that exceed local policy limits; to ensure proper documentation of the need for the services; and to verify that an appropriate approval process has occurred. In addition, they will be examining the Individual Training Account (ITA) and supportive service award and denial processes to determine if they have resulted in equitable decisions and that the awards and denials are properly documented. To accomplish this, the regions will need to provide the SWL with the following items prior to the monitoring site visit:

- A list of WIA Adult, Dislocated Worker, and Youth clients active during the review period that identifies the cumulative amount of funds spent on each individual for training and for supportive services. (**Note:** Questions have arisen regarding the types of expenditures that should be included in the training category. For purposes of this review, workforce regions should include only those expenditures associated with ITAs, OJTs, and customized training for Adults and Dislocated Workers, and all of these plus Work Experience for Youth. Although some short-term training is provided to clients as a Pre-vocational (PV) intensive service, these costs should not be included.)
- Any written procedures for awards and denials of ITAs and supportive services
- Local ITA and supportive services policies (These may already have been provided to the SWL as part of the Administrative Review.)

Once the SWL has a document listing each client with a separate total expended for training and for supportive services, the SWL will calculate the average amount spent on training and the average amount spent on supportive services. The SWL will then select a sample of client files for review whose expenditure amounts are above the average or above local policy caps. The SWL may also select additional files when unusual levels of expenditures are noted, or may select a totally random sample of files to review.

The per-client expenditure file review will consist of examining selected documents such as:

- The Individual Employment Plan or Individual Service Strategy
- Case notes
- ITA training request package and approval forms
- Supportive services request and approval forms

These documents should demonstrate the need for the services and an appropriate request and approval/sign-off process for the services.

The SWL will then review any centralized files or charts for tracking supportive services and ITA requests. In particular, they will examine the reasons for awards and denials of these services to ensure they are in compliance with local policies and are fairly and equitably determined.