

BILL RITTER, JR.
Governor

DONALD J. MARES
Executive Director

THOMAS J. LOOFT
Director, Workforce
Development Programs



DEPARTMENT OF LABOR AND EMPLOYMENT

WORKFORCE DEVELOPMENT PROGRAMS

633 17th Street, Suite 700
Denver, Colorado 80202-3660

Category: Workforce Investment Act (WIA)
Subject: Wagner Peyser and WIA Program Review Process
Source: Federal/State
Revise/Replace: 07-10-WIA
Contact: Workforce Development Programs Director
Distribution: Managers, Workforce Development Staff, Workforce Region Directors, Fiscal
Colorado One-Stop System Policy Guidance Letter#: 08-14-WIA
Date: October 24, 2008

I. REFERENCE(S):

Title I of the Workforce Investment Act (WIA) of 1998; WIA Final Rules – 20 CFR Parts 667.400-410, et al. (August 11, 2000); Wagner Peyser Act of 1933 as amended by Title III of the Workforce Investment Act (WIA) of 1998; 20 CFR 652.8 State Employment Service System Administrative Provisions.

II. PURPOSE:

The purpose of this PGL is to introduce an improved program review process (starting in PY08) for Wagner-Peyser (WP) and Workforce Investment Act (WIA) programs and grants that will replace four-phases with three phases of review. In addition, this PGL will provide a revised schedule and expanded discussion guides for this three-phase review process.

Since Annual Compliance Monitoring takes place in the quarter immediately following the completion of a program year, a decision has been made to revamp Phase I and move it to November to reduce the overlap of the monitoring and program review processes. Phase II will be conducted in February and Phase III will occur in May. Review of performance and plan outcomes for the previous program year will be combined with the annual compliance monitoring review.

The intent of the changes are to further enhance the discussions between CDLE and the workforce regions while tracking the progress of local programs and projects throughout a program year. These ongoing discussions will identify strengths and gaps in a region's programs, systems, and processes and provide timely opportunities for technical assistance.

III. BACKGROUND:

WIA Final Rules – 20 CPR §667.410 (a) states that each recipient and sub-recipient must conduct regular oversight and monitoring of WIA activities and those of sub-recipients and contractors in order to:

- (1) Determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and the regulations in this part;
- (2) Determine whether or not there is compliance with other provisions of the Act and the WIA regulations and other applicable laws and regulations; and
- (3) Provide technical assistance as necessary and appropriate.

During PY01 and PY02, the Colorado Department of Labor and Employment (CDLE) developed and implemented an initial annual compliance monitoring and quarterly review system that was designed to:

- Provide a mechanism for the State to evaluate whether local regions and contractors are in compliance with all program requirements;
- Enable a dialogue between the local regions and the State regarding program effectiveness and technical assistance needs;
- Provide an opportunity for regions to demonstrate best practices that can be shared with other regions.

In PY05, CDLE implemented PGL 05-17-WIA that provided information and guidelines for the quarterly reviews and the annual compliance monitoring of WP and WIA programs and discretionary grants. The quarterly reviews were expanded to include a more comprehensive look at the status of programs and grants, and the annual compliance monitoring was divided into two segments and included a review of per-client expenditures.

Starting in PY07, annual compliance monitoring was completed in its entirety after the close of the program year and focused strictly on elements concerning compliance with laws, regulations, and policies. At the same time, the State has retained the option to cite a compliance issue at any time during the program year as well as issue a formal compliance letter when deemed appropriate. A new PGL addressing the annual compliance monitoring process will be issued in the fall of 2008.

The program reviews were also implemented for the first time in PY07 and will continue to serve as an on-going analysis of a region's plans, programs, performance, funding, expenditure levels, and other resources. It will be conducted separately from the compliance monitoring.

Program reviews will be conducted utilizing the data from quarterly fiscal and participant charts, discussions with appropriate workforce center staff, and will include provisions for technical assistance as requested or needed. Report summaries will be issued to the Workforce Director following the completion of each phase.

IV. POLICY/ACTION:

PROGRAM REVIEW PROCESS

The State Workforce Liaisons will begin using the revised three-phase program review process in PY08. This process will be implemented on the following schedule:

- Phase I: Program Implementation Review - November
- Phase II: Mid Year Progress Review - February
- Phase III: Strategic Planning and Performance Review - May

Phase I: Program Implementation Review (November)

- 1. Review projected fiscal and participant goals in the new Annual Plan. (utilizing Joblink and Financial Reporting data included in the 1st Quarter Chart)**
 - a. Funding levels/expenditures
 - b. Participant numbers
 - c. Common Measures

- 2. Discuss programs, projects, and goals outlined in the region's Plan for the current year**
 - a. New strategies in:
 - WIA programs - Adult/Dislocated Worker/Youth
 - Wagner Peyser
 - b. Implementation of new and strategic initiatives (e.g. Sector Strategies)

- 3. Review changes within workforce center operations and administration**
 - a. Staffing/Organizational Chart
 - b. Offices
 - c. Procedures
 - d. Policies
 - e. Management Information Systems (MIS)
 - f. New subcontractors. Concerns with existing subcontractors
 - g. Internal monitoring – process and findings
 - h. Resources/Equipment/Technology
 - i. Workforce Investment Board (WIB)
 - j. Youth Council
 - k. Memorandum of Understanding (MOU)/Resource Sharing Agreement (RSA)
 - l. Program Income/Fee for Service
 - m. Capital Equipment Purchases (PRAF/PAF)

- 4. Discuss all new and ongoing discretionary grants and set-asides**
 - a. Consult with workforce center staff to populate discretionary grant tracking tools that are customized to each grant's strategies, goals, and outcomes

- b. Chart all current grants
- c. Discuss status of ongoing grants (utilizing the region's quarterly reports)

5. Discuss Colorado Workforce Development Council projects in the region

- a. CIMS
- b. Marketing grant
- c. Awards
- d. Special projects
- e. Disability Program Navigator

6. Discuss training and technical assistance needs

- a. Participation in CDLE sponsored training
- b. In-house training
- c. National and regional conferences and trainings

7. Conduct follow-up with the region on any previously identified areas of concern and provide technical assistance as needed

Phase II: Mid Year Progress Review (February)

1. Review 2nd quarter data (utilizing Job Link and Financial Reporting data)

- a. Funding levels/expenditures
- b. Participant numbers
- c. Common Measures
- d. Identify and discuss needed or required annual plan modifications (modifications are due by March 31st)

2. Review progress of programmatic goals

- a. Accomplishments or challenges
- b. Changes in strategy, staff assignments, resources, etc.
- c. New and strategic initiatives

3. Review impacts of previous changes within workforce center operations and administration. Identify additional changes.

4. Review status of discretionary grants and set asides (utilizing the region's quarterly reports and the Discretionary Grant Tracking Tools)

- a. Are modifications needed or required?

5. Review Colorado Workforce Development Council Projects in the region

6. Discuss training and technical assistance needs

- a. Participation in CDLE sponsored training
- b. In-house training
- c. National and regional conferences and trainings

7. Conduct follow-up with the region on any previously identified areas of concern and provide technical assistance as needed

Phase III: Strategic Planning and Performance Review (May)

- 1. Review 3rd quarter data (utilizing Job Link and Financial Reporting data)**
 - a. Funding levels/expenditures
 - b. Participant numbers

- 2. Assess attainment levels for Common Measures and discuss plans for improvement, if needed**

- 3. Discuss Strategic Planning for the next program year**
 - a. Identification of new opportunities and avenues for change and strategic initiatives
 - b. Identification of challenges and barriers
 - c. Implementation and development of annual Plans

- 4. Review status of CWDC projects, and all other discretionary grants and set asides**

- 5. Identify Best Practices**

- 6. Discuss training and technical assistance needs**
 - a. Participation in CDLE sponsored training
 - b. In-house training
 - c. National and regional conferences and trainings

- 7. Conduct follow-up with the region on any previously identified areas of concern and provide technical assistance as needed**

Note: The Rural Consortium has eleven sub-regions and three sub-contractors that provide the WIA program services; therefore, the program review process will be modified to fit this structure.

REPORTS

A summary report of each phase will be sent electronically to the regional Workforce Director within 30 days of the review. These reports will summarize the discussions that occurred and note any significant changes, challenges, concerns, and accomplishments. The quarterly chart used in the review phase will be attached. These reports will not require a response from the regions.

An Executive Summary highlighting programmatic events, challenges, and accomplishments will be prepared at the end of the program year as an addendum to the Annual Compliance Monitoring Report.

**V. IMPLEMENTATION DATE:
Program Year 2008**

VI. INQUIRIES:

Please direct all inquiries to your State Workforce Liaison at CDLE, Workforce Development Programs.

Thomas J. Looft, Director
Workforce Development Programs

Attachments:

- #1 Phase I: Program Implementation Review
- #2 Phase II: Mid-Year Program Review
- #3 Phase III: Strategic Planning and Performance Review
- #4 Program Review and Annual Compliance Monitoring Calendar
- #5 Quarterly Chart for each program review phase