

Oklahoma Employment Security Commission
Workforce Integrated Programs Division

MEMORANDUM #M-17-2010

TO: Local Workforce Investment Boards

FROM: Richard J. Gilbertson, Director
Workforce Integrated Programs Division

DATE: November 1, 2010

SUBJECT: ARRA NEG OJT and OK Jobs Now Initiative Monitoring Plan Guidance

MESSAGE: OETI 04-2010 *Governor's Oversight and Monitoring Plan* requires all Local Workforce Investment Boards (LWIBs) and local area subrecipients/sub-grantees (i.e., fiscal agents) to develop local written policies and procedures to direct monitoring and oversight activities funded by the Workforce Investment Act and other related federal grants.

As part of OESC's policies and procedures, local monitoring policies, procedures and activities are reviewed annually by State monitors. All areas do have written policies and procedures for evaluating program and financial compliance which have been reviewed by OESC. While current Local Monitoring policies and procedures may be sufficient to ensure compliance with the Workforce Investment Act, additional or increased program and oversight requirements are necessary due to the ARRA NEG OJT and the OK Jobs Now funding.

In accordance with the contractual agreement between Oklahoma Department of Commerce, U.S. Department of Labor and Oklahoma Employment Security Commission, local grant recipients must develop monitoring plans that ensure strict compliance with the Recovery Act funds. **If a local area's local monitoring policy and procedures do not currently address the requirements listed below, they must be revised or an addendum made to existing policy and procedures to include:**

1. One hundred percent (100%) eligibility review of dislocated worker participants receiving services under the ARRA NEG OJT and the *OK Jobs Now* funding must be conducted through a 30-day review process.
2. LWIBs must identify the number on OJT contracts that will be reviewed to ensure contractual compliance with Special Policy Guidelines of TEGL #4-2010 and OETI #16-2010 and #20-2010, (e.g., 100%, sample percentage, etc.).

3. All OJT worksites must be reviewed onsite at least once during the training period in accordance with OETI # 16-2010 to include proper completion of OJT attendance records and accurate reimbursement of wages.
4. LWIBs must describe their policy/procedures for OJT employer orientation, and how they will ensure worksites are compliant with applicable State, Federal, and Local policy requirements.
5. LWIBS must describe their policy/procedures to ensure all costs charged by service providers or contractors to the ARRA NEG OJT and the OK Jobs Now grants are allowable costs under the grant agreements and sufficiently documented.
6. LWIBs must describe their policy/procedures to ensure Needs Related Payments and Supportive Services are not paid with ARRA NEG OJT and the OK Jobs Now funds, but when needed are paid with other funding sources in accordance with Federal, State and Local established policies.
7. LWIBs must describe the frequency of monitoring for the ARRA NEG OJT and the OK Jobs Now programs, (e.g., schedule by date and/or component) and include a monitoring schedule.
8. LWIBs must describe any changes to the established reporting process (e.g., issuance of reports, necessary responses and the timeframes for each).
9. LWIBs must include any forms that will be used to document the above processes.

ACTION: LWIBs must submit a copy by e-mail of their Monitoring Policies and Procedures and any addendum, schedule, and forms for review and approval to Tami Decker, Program Manager, at tdecker@oesc.state.ok.us, by November 30, 2010.

INQUIRES: If you have questions please contact Jackie Younge at (405) 557-5314, jackie.younge@oesc.state.ok.us, or Tami Decker at (405) 962-7595, tdecker@oesc.state.ok.us.