OVERSIGHT AND MONITORING

The DLR One-Stop Operator and One-Stop Career Center, or job service office, managers are responsible for implementation of workforce programs in compliance with state policies and procedures. Staff from the Workforce Development, Administrative Services, and Policy and Public Affairs Divisions are responsible for oversight and monitoring of the programs offered through the One-Stop Career Centers to ensure compliance with federal laws, regulations, guidance, and state policies and procedures. The purpose of this monitoring process is to identify technical assistance needs with the goal of continuous improvement.

This process ensures:

- DLR programs achieve the intended results.
- Resources are utilized efficiently and effectively for authorized purposes and are protected from waste, fraud, and abuse.
- Accurate and timely information is reported to serve as the basis for improved decision-making and required reporting.

PROGRAM REVIEWS

PROCESS

Each year the Workforce Development Director and Workforce Data Team will complete an analysis of certain provisions required for each program. The outcome of this analysis and a suggested implementation will be provided to the appropriate Team to improve areas of deficiency.

ANALYSIS

- WIOA Title I Youth expenditure rates including the work experience expenditure and out-of-school youth expenditure
- WIOA Title I Adult priority of service to those who are low income, receiving public assistance, or basic skills
 deficient
- Co-enrollment of the WIOA Title I Youth and Adult in the Adult Education and Literacy (AEL) program
- Placement of participants in the Senior Community Service Employment Program (SCSEP) slots
- SCSEP training expenditure rate
- Provision of services to eligible Jobs for Veterans State Grants (JVSG) participants
- Co-enrollment of JVSG in WIOA Title I programs
- Co-enrollment of WIOA Title I Youth and Adult in Temporary Assistance for Needy Families (TANF)
- Work placement rate of TANF
- Training completion
- Active File Review Trends
- Data Validation Trends
- Trade Adjustment Act Data Integrity Trends
- Progress towards negotiated performance
- Performance related to U.S. DOL approved state plan waivers as applicable
- Number of Reemployment Services Eligibility and Assessments (RESEA) scheduled and completed
- Migrant Seasonal Farmworker (MSFW)
 - During the Migrant Seasonal Farmworker (MSFW) review conducted, the State Monitor Advocate (SMA) will conduct a file review. The purpose of the participant file review is to ensure MSFW data is being accurately documented in SDWORKS, all the required data is collected, and to review if MSFW participants are provided services equally.
 - Use the below reports to find participants with a high probability of being MSFW and review files to see
 if:
 - Participants have the correct MSFW status (MSFW or non-MSFW)
 - MSFWs are provided equal opportunity to WP and WIOA services
 - All required data elements are collected (PIRL 413, 808, 941, and 912)

- Eligibility determination for Title I programs
- Provision of intake and orientation to the One Stop
- Initial assessment of skill levels
- Direct linkage with partner programs as appropriate to the customer
- Utilization of Individualized Employment Plans
- Provision of information regarding the availability of support service assistance
- Access to training services
- Provision of follow up services
- Establishment and maintenance of strategic, integrated, and defined partnerships
- Coordination with other DLR teams
- Procedures are in place to assure coordination of services to avoid duplication
- Processes are in place to ensure communication and training as needed regarding policies and procedure updates
- Professional development is offered to all One Stop staff
- Team members are informed and kept up to date on labor market trends
- Strives for continuous improvement, including incorporating customer feedback
- Programmatic accessibility is in compliance with Section 188
- Operates in a cost efficient manner
- Services are provided outside of normal business hours as needed
- Review of time keeping, including policy, to ensure proper alignment.

ACTIVE FILE REVIEWS

PROCESS

Active File Reviews will be conducted semi-annually once in the fall and once in the spring during weeks designated by the Workforce Development Director. Team members will assist the Labor Program Specialists with reviewing active files. Labor Program Specialists will assign files to be reviewed and provide training on the process. At least one file from each case manager will be reviewed during each review cycle. An Employment Specialist will not review their own files. Team members will review files from their team. The Team leadership can work with leadership from other's teams to ensure accurate review of various programs participants are enrolled in. Forty-five days following the review, a brief summary of themes discovered from the review and an improvement plan with timelines will be provided to the Director of Workforce Development.

Reviews will be conducted with a standardized review sheet for each team that considers eligibility, provision of services, quality of case management, documentation, fiscal accountability, and inclusion of data validation elements. Labor Program Specialists will provide an accurate and updated review sheet. Updates will be made through the workforce memo process.

Upon completion of DLR's active file review of the **SNAP E&T** program, the Department of Social Services (DSS) completes a further review. Once DSS completes the file reviews, the Employment Specialist and Job Service Manager will be notified of any corrective action needed. All identified corrective actions must be addressed and completed within 25 days of the notification. Upon completion, the Employment Specialist or Job Service Manager must notify the LPS who will then inform DSS.

PROGRAMS

DLR programs included in the active file review process include:

- Reentry Employment Services (RES)
- National Dislocated Worker Grants (NDWG)
- Senior Community Service Employment Program (SCSEP)
 - One file per SCSEP case manager every quarter will be completed with the above timeline and process.
- Trade Adjustment Assistance (TAA)
- Jobs for Veterans State Grants (JVSG)
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

- Twenty-Five percent of each SNAP E&T case manager's case files will be reviewed, with no more than 15 individual files being pulled during any one quarter, every quarter with the above timeline and process. In addition, DLR Labor Program Specialist will also review completed Title III and Title I active file reviews for SNAP E&T data entry compliance. After the DLR Labor Program Specialist reviews are completed, the reviews will be provided to and reviewed by the DSS Program Specialist.
- Temporary Assistance for Needy Families (TANF)
 - Twenty-Five percent of each TANF case manager's case files will be reviewed every quarter with the above timeline and process.
- WIOA Title I Adult, Dislocated Worker, and Youth
- WIOA Title III Wagner-Peyser

An Active File Review Report identifying the names of the files reviewed, errors, and promising practices will be made available to each Team allowing the opportunity to make improvements to the file.

DATA VALIDATION

TIMELINE

With the exception of the Senior Community Service Employment Program (SCSEP) which is conducted annually, data validation will be completed by the DLR Workforce Data Team on quarterly bases for the active program year. Data validation information will be pulled from South Dakota's management information system, SDWORKS, no earlier than 45 days after the end of a quarter.

PROCESS

The random sampling tool within SDWORKS will be utilized to generate a sufficient representation of records from each program. Files that are subject to data validation include participants who exited and are subject to reporting during the given program year.

The file review team will validate the Authorization to Work and Selective Service registration requirements for Title I program participants, the common data elements outlined in TEGL 7-18, and the data elements outlined in TEGL 23-19 Change 2. For each validated individual data element, a pass or fail grade will be assessed.

For most data elements, the validation guidelines provide multiple forms of acceptable source documentation. If the State collects multiple sources for the same data element and the sources conflict, the most objective source should be used to determine if the data element is valid and accurate.

Source documentation for data validation items <u>must be uploaded into SDWORKS</u>. Hard copies are not acceptable (as outlined in Document Management Policy 8.20) and will not be considered for data validation purposes.

The general categories of source documentation types include:

- Case Notes: Case notes refer to either paper or electronic statements by the case manager that identifies, at a minimum, the following: (a) a participant's status for a specific data element, (b) the date on which the information was obtained, and (c) the name of the case manager who obtained the information.
- Cross-Match: A cross-match requires grantees to identify detailed evidence that confirms the data element in a secondary database. Grantees must also confirm supporting information such as dates of participation and services rendered. Grantees must have data-sharing agreements in place as appropriate.
- Electronic Records which may include:
 - Participant Source Documents: Participant source documents are maintained in the grantee's management information system (MIS) or another official record-keeping system.

- Grantee participant service record: Grantee participant information generated and maintained by the
 grantee regarding the specific services received by a participant. The information may be generated and
 maintained through the grantee's MIS or another official record-keeping system.
- **Self-Attestation:** Self-attestation means a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant.
 - Electronic signatures or a submission from the participant such as an email, text, or unique online survey response is considered an electronic signature or verification; it must be participant-generated and traceable to the participant. Documentation of the self-attestation must be retained.

A Data Validation Report identifying the elements reviewed and failure rates will be made available to Program Teams.

PROGRAMS and SAMPLE SIZE

DLR programs included in the data validation review process include:

- National Dislocated Worker Grants, when applicable
 - o 1% per program, but not to exceed 100 files
- Registered Apprenticeship
 - o 10 files
- Trade Adjustment Assistance (TAA)
 - o 1% per program, but not to exceed 100 files
- WIOA Title I Adult, Dislocated Worker, and Youth
 - 1% per program, but not to exceed 100 files
- WIOA Title III Wagner-Peyser
 - At least .5%, but not to exceed 100 files
- JVSG
 - Conducted in conjunction with WIOA Title III Wagner-Peyser
- SCSEP
 - o Provided by U.S. DOL

WIOA §107, §116, §129, §134 20 CFR §677.150, §679.370, §683.400-440 WIOA Participant Individual Record Layout