

ST. LAWRENCE COUNTY
WORKFORCE DEVELOPMENT BOARD

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**WORKFORCE INNOVATION AND
OPPORTUNITY ACT**

**FINANCIAL, ADMINISTRATIVE PROGRAM
REVIEW GUIDE**

Adopted by the St. Lawrence County Workforce Development Board: September 9, 2015

September 9, 2015
ST. LAWRENCE COUNTY WORKFORCE DEVELOPMENT BOARD
Resolution No. 15-I09-15

AUTHORIZING THE ACCEPTANCE AND ADOPTION OF BYLAWS, POLICIES AND PROCEDURES, CONTRACTS AND LEASES/SUBLEASES, ADOPTED BUDGETS AND OTHER FINANCIAL RESPONSIBILITIES, TOGETHER WITH ALL OTHER CONTINUING RESPONSIBILITIES AND POWERS, FROM THE ST. LAWRENCE COUNTY WORKFORCE INVESTMENT BOARD

WHEREAS, coming into compliance with the Workforce Innovation and Opportunity Act of 2014 (WIOA) requires that Workforce Investment Boards become Workforce Development Boards; and

WHEREAS, WIOA has mandated several other changes in the organization of Workforce Investment Boards; and

WHEREAS, the St. Lawrence County Workforce Investment Board took actions at its June 10, 2015 meeting to initiate all these changes and to transfer its WIOA-compliant operations to the St. Lawrence County Workforce Development Board (WDB) ; and

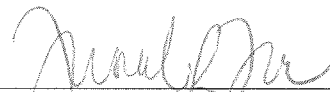
WHEREAS, at its August 3, 2015 meeting the St. Lawrence County Board of Legislators (BOL) took official action to replace the temporary WDB it had appointed at its July 7, 2015 meeting with membership that was fully compliant with WIOA requirements; and

WHEREAS, both the County BOL and the WDB recognize that the WDB is and should be the successor in due course to the WIB;

WHEREAS, now that a WIOA-compliant WDB is in place, it is appropriate and prudent for the WDB to officially accept and adopt the bylaws and all the policies and procedures, contracts and leases/subleases, and adopted budgets and other financial responsibilities, together with all other continuing responsibilities and powers, from the WIB ; and

NOW, THEREFORE, BE IT RESOLVED that the St. Lawrence County Workforce Development Board does hereby officially accept and adopt the bylaws and all the policies and procedures, contracts and leases/subleases, and adopted budgets and other financial responsibilities, together with all other continuing responsibilities and powers, from the St. Lawrence County Workforce Investment Board effective on July 1, 2015 and authorizes, empowers, and directs its staff to continue to operate the workforce development system in St. Lawrence County according to the precedents established prior to July 1, 2015 when and as appropriate and consistent with WIOA.

I, Jennifer R. Free, Assistant to the Executive Director of the St. Lawrence County Workforce Development Board, DO HEREBY CERTIFY, that I have compared this copy of this Resolution, adopted September 9, 2015; with the original record in this office and that the same is a correct transcript thereof and of the whole of said original record.



Jennifer R. Free, Assistant to the Executive Director
St. Lawrence County Workforce Development Board
September 9, 2015

ST. LAWRENCE COUNTY
Financial, Administrative, Program
Review Guide
Workforce Innovation and Opportunity Act

Subgrantee/Vendor Fiscal Oversight:

The Function of Monitoring Review:

The St. Lawrence County Assistant Accounting Supervisor will monitor with on site visits and desk reviews the following items if it is determined they pertain to the Fixed Fee Agreement payment. Technical Advisory 4-19 will be utilized in conducting the monitoring review.

- A. The focus of the monitoring visits will be to determine if the Sub Recipient financial system provides the following:
1. Effective internal controls to safeguard funds and assure proper use;
 2. A comparison of actual expenditures with the budgeted amounts in each contract
 3. Cash management controls that limit cash advances to actual immediate disbursements
 4. Determine that program costs have been correctly charged and documentation to support these costs have been retained. *See Attachment A-1*
 5. All costs have been charged to the appropriate cost categories and are within the cost limitations specified in the WIOA Act and the Federal Register. *See Attachment A-1*
 6. Require a copy of the Sub Recipient's annual audit if they receive over \$750,000.00 in Federal Funding in one year per Circular A-133. *See Attachment A-2*
 7. All services are in compliance with the WIOA Act and other regulations or laws that are applicable to the WIOA Program.
 8. Offer Technical Assistance when required by subrecipient or deemed necessary by St. Lawrence County and is appropriate.
 9. Monitor Reviews will be conducted as follows: (agencies to be monitored – *See Attachment A-4*)
 - a. Financial system review will be on a yearly visit or if required by either parties of the contract on a more frequent basis. The review will be conducted during the months of July through October.
 - b. Desk Reviews will occur each time a Request for Reimbursement and Monthly Expenditure Report is received. For Desk review see *Attachment B*
 - c. EEO Requirements will be monitored on a yearly basis. The review will be conducted during the months of July through October. *See Attachment C*
 - d. Procurement & Property Management Reviews will occur biennially. The review will be conducted during the months of July through October.
- B. Summary Observations and Remediation:
1. Subrecipients will be notified in writing of any findings resulting from the review, within 30 days of the review. If required by either party, an on-site visit will be made to discuss the findings. If the Subrecipient does not file a Complaint/Grievance within 30 days of notification, St. Lawrence County will do another on-site monitoring visit to determine if corrective actions have taken place. If corrective actions have not taken place, funding to the Sub Recipient may be discontinued, until such time corrective actions have taken place.
 2. The St. Lawrence County Workforce Development Board will be notified in writing of any significant findings resulting from the review, within 30 days of the review.
 3. NYSDOL will be notified in writing of any significant findings resulting from the review, within 30 days of the review.
 4. Resolution process of findings from the Monitoring Review. *See Attachment D*
 5. A Monitoring Review File will be maintained for each Sub Recipient, which will include a written report for every Fiscal on-site Visit and Fiscal Desk Review.
 6. The St. Lawrence County LWDA will maintain the Monitoring Review File for either three (3) years after the Final Closeout of the Title the funds were paid out of or three (3) years after Audit of such costs, which ever comes first.
 7. Staff Personnel who will perform monitoring:
 - a. Assistant Acct Supervisor-
Fiscal Reviews/
Procurement & Property Review

Compliance with new Requirements set forth by NYS DOL:

The Subgrantee/Vendor Fiscal Oversight Review Policy will be adjusted accordingly, upon receipt of any new Technical Advisories, Teins, OMB Circulars or revision to the afore mentioned documents that, address changes to Subgrantee/Vendor Fiscal Oversight Review.

Fiscal and Administrative Compliance Requirements Review:

St. Lawrence County Fiscal agent will Monitor each Subrecipient and receive a copy of the entities audit if it expends more than \$750,000 in federal awards. Audit reports will be requested to be submitted within thirty (30) days after receipt of auditor's report or not later than nine months after the end of the auditee's fiscal year. *See Attachment A-3.* The audit will be reviewed using the Audit Review Checklist for Single Audits. *See Attachment A-4.* If there are audit findings then the Fiscal Agent will determine the need for and ensure the implementation of correction action for all findings that impact the program, allow or disallow all questioned costs and provide the basis for each such determination and establish a debt (where appropriate) and indicate the method of repayment planned or required.

Subrecipient Monitoring Activity

A subrecipient shall not contract with a subcontractor to perform any work, labor services, duties or functions without written approval from the St. Lawrence Workforce Development Board. The subrecipient shall be responsible for all WIOA funds received and shall be responsible for the actions of its subcontractor. All provider subcontracts entered into by the Subrecipient are subject to the WIOA Financial Management Review according to the Workforce Development System Technical Advisory #04-19. The subrecipient review of the subcontractor should be completed no later than 30 days from the ending date of each year of the contract. The St. Lawrence County Fiscal agent will be responsible to perform the subrecipient monitoring of their review. The review will be conducted during the months of July through October.

Program Monitoring and Oversight:

Program Monitoring for Youth, Adult and Dislocated Worker Services as provided by WIOA Staff:

The Assistant to the WDB Executive Director annually will monitor files, documentation, and data entry in the One Stop Operating System for the purpose of oversight of local Youth, Adult and Dislocated worker activities as authorized under the Workforce Innovation and Opportunity Act. The monitor will report to the Local Workforce Development Board regarding the accurate documentation of eligibility, required data validation information and the provision of services to WIOA Youth, Adults, and Dislocated Workers.

A. The focus of the monitoring will be to determine if the participant case files (hardcopy and electronic) are accurate, reliable and up-to-date. For Youth, the participant data reported in the One Stop Operating System must accurately reflect the data in the participants file. For Adults and Dislocated Workers the participant data is found primarily in the One Stop Operating System with a participants file containing documentation required for data validation or in the case of the use of Trade Act funds will contain the required TAA documentation. The following procedures will be utilized:

- 1) Between October and December of each year 5% of all participants served in the prior program year will be randomly selected by the WIOA Supervisor and assigned to the Assistant to the WDB Executive Director for program monitoring.
- 2) The Assistant to the WDB Executive Director will do a thorough review of each participants file using the attached monitoring tools for Youth, Adult and Dislocated Worker. *See Attachments E-1, E-2, E-3, E-4*
- 3) Upon completion, the Assistant to the WDB Executive Director will report to the WIOA Supervisor and the Senior Employment and Training Counselor his/her findings and these findings will be reviewed with all staff providing services so that corrective action, if needed, may be taken.
- 4) The Assistant to the WDB Executive Director will report these findings to the Workforce Innovation and Opportunity Act Board at its next scheduled meeting.

Monitoring of Performance Measures

On a quarterly basis the WIOA program supervisor will review and monitor the Common Measures and Customer Service Indicators for Youth, Adult and Dislocated Worker. Any measures that the LWDA program is failing will be discussed with the Executive Director of the WDB and a discussion of what actions need to be taken will be conducted with the WDB.

Technical Assistance when required by subrecipient or deemed necessary by St. Lawrence County and is appropriate. Programmatic Desk Monitoring Reviews will occur on a Monthly Basis for on going services. See *Attachment E* Technical Advisory 4-19 will be utilized in conducting the monitoring review.

Summary Observations and Remediation

- 1) Subrecipients will be notified in writing of any findings resulting from the review, within 30 days of the review. If required by either party, an on-site visit will be made to discuss the findings. If the Subrecipient does not file a Complaint/Grievance within 30 days of notification, St. Lawrence County will do another on-site monitoring visit to determine if corrective actions have taken place. If corrective actions have not taken place, funding to the Sub Recipient may be discontinued, until such time corrective actions have taken place.
- 2) The St. Lawrence County Workforce Development Board will be notified in writing of any significant findings resulting from the review, within 30 days of the review.
- 3) NYSDOL will be notified in writing of any significant findings resulting from the review, within 30 days of the review.
- 4) Resolution process of findings from the Monitoring Review. See *Attachment D*
- 5) A Monitoring Review File will be maintained for each Sub Recipient and will include a copy of the Monthly Service Status Report.
- 6) The St. Lawrence County LWDA will maintain the Monitoring Review File for either three (3) years after the Final Closeout of the Title the funds were paid out of or three (3) years after Audit of such costs, which ever comes first.

Compliance with new Requirements set forth by NYS DOL:

The Subgrantee/Vendor Fiscal Oversight Review Policy will be adjusted accordingly, upon receipt of any new Technical Advisories, Teins, OMB Circulars or revision to the afore mentioned documents that, address changes to Subgrantee/Vendor Fiscal Oversight Review.

St. Lawrence County
WIOA On-Site Monitoring Review Sheet

Topic	Yes	No	Date	Monitor	Notes/Findings
Adequacy of Internal Controls					
Accuracy of Fiscal Reporting					
Does Report Reflect Actual Expenditure					
Cash Management Controls					
Are Cash Advances limited to immediate Expense					
Allowable Program Expenditures					
Cost Allocation					
Cost Allowability					
Proper charging of program costs					
Retention of documentation of costs					

St. Lawrence County
Analysis of Audit Reports

Subrecipient _____

Date of Audit _____

Date Report Received _____

Audit Firm _____

Audit Period Covered _____

Questioned Costs _____

Audit Findings _____

Resolution Action _____

St. Lawrence County One-Stop Career Center
Human Services Center
80 State Highway 310 Suite 8, Canton, New York 13617-1498
Phone: (315) 386-3276 Fax: (315) 386-3414
www.slconestop.com

October 31, 2011

TO:
FROM: Penny Scott, Assistant Accounting Supervisor
RE: Monitoring – Subrecipients - Single Audits

The St. Lawrence County Workforce Development Area has monitoring requirement as a result of the New York State DOL Technical Advisory #04-19, to be perform on it's Subrecipients.

Non federal entities that expended more than \$750,000.00 in federal awards (all sources) shall have a single or program audit conducted. One of the requirements is, to obtain a copy of the single audit.

Our records indicate payments were issued to _____ for contract period _____.

If you meet the above requirements, please send us your most recent audit report. If you do not, please complete the information below and return to this office. Please respond by _____.

If you have any questions, please do not hesitate to contact me.

Agency: _____ Contract Period: _____

I hereby certify that our agency does not expend \$750,000.00 or more in Federal in funds
And therefore are exempt from the single audit requirement.

Name (printed) _____ Title: _____

Signature: _____

Date: _____

AUDIT REVIEW CHECKLIST FOR SINGLE AUDITS

Audit Report

	<u>Yes</u>	<u>No</u>	<u>N/A</u>
1. Does the audit report include the following:			
A. The auditee's financial statements?			
B. Report (opinion) on the financial statements?			
C. Schedule of Federal award by Catalog of Domestic Assistance (CFDA) number?			
D. Report (opinion) on the schedule of Federal awards?			
E. Report on internal controls related to the financial statements and major programs?			
F. Report on compliance with laws, regulations, etc...?			
G. Schedule of findings and questioned costs? (If none, schedule should say none.)			
H. Schedule of prior audit findings?			
I. The auditee's corrective action plan?			
2. Do you understand and agree with the type of financial opinion given (qualified, unqualified, adverse, disclaimer)?			
3. Do the opinions refer to the government audit standards (Yellow Book) and OMB Circular A-133?			
4. If the audit refers to "another comprehensive basis of accounting, " is this correct? - GASB STMT 65			
5. Are the opinions dated as of the last day of fieldwork?			
6. If there are significant deficits in any fund balance, are they clearly explained?			
7. Has the auditor provided the agency with copies of any recommended adjustments to the books?			
8. If there are supplementary schedules, is there an opinion covering the supplementary information?			
9. Are the accounting policies clearly explained in the notes of the financial statements?			
10. Does the audit discuss the status of the prior year audit finding(s)?			
11. Do the findings clearly indicate the criteria for each current finding?			
12. Are the agency's comments included with each current finding?			
13. Are the current findings clearly written in such a manner that they can be responded to?			

Agencies to be Monitored:

Agency: St. Lawrence-Lewis BOCES

Contract: Youth Career Training Programs and Youth Tutoring

Contract Period: 9/1/15 – 6/30/16

Agency: Seaway Valley Prevention Council

Contract: Connections

Contract Period: 9/1/15 – 6/30/16

Agency: St. Lawrence County Youth Bureau

Contract: Discover Your Future Here

Contract Period: 9/1/15 – 6/30/16

ST. LAWRENCE COUNTY
Financial, Administrative
Review Guide
Workforce Innovation and Opportunity Act

Subgrantee/Vendor Fiscal Oversight:

Compliance with new Requirements set forth by NYS DOL:

The Subgrantee/Vendor Fiscal Oversight Review Policy will be adjusted accordingly, upon receipt of any new Technical Advisories, TEGLS, OMB Circulars or revision to the afore mentioned documents that, address changes to Subgrantee/Vendor Fiscal Oversight Review.

Fiscal and Administrative Compliance Requirements Review:

Upon receipt of a request for reimbursement/Financial Report of a subcontract by Fiscal, a desk review is conducted using a Financial and Administrative Desk Review Form performing the following verifications:

- 1.) Verification of the Financial Report Budget agrees with the signed contract.
- 2.) Verification of the Financial Report period agrees with the signed contract.
- 3.) Verification of the Expenses Reported are allowable under the scope of the signed contract.
- 4.) Verification that request for reimbursement does not exceed the Budget of the signed contract.
- 5.) Verification that the Trainee is enrolled into a WIOA Program.

See Attached Financial and Administrative Desk Review Form

St. Lawrence County One-Stop

Human Services Center

80 State Highway 310 Suite 8, Canton, New York 13617-1496

Phone: (315) 379-3276 Fax: (315) 386-3414

Christopher Rediehs
Commissioner

Penny Scott
Assistant Accounting Supervisor

Financial and Administrative Desk Review
Subcontracts

Subcontractor: _____ Contract: _____ To _____ Amount: \$ _____

Period Submitted For: From: _____ To _____ Amount: \$ _____

	Budget	Current Period	Previously Submitted	Total To Date	Balance
Line Item	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____
Line Item	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____
Line Item	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____
Line Item	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____
Total	\$ _____	\$ _____	\$ _____	\$ _____	\$ _____

- Does Budget amount agree with Budget Section of the Contract? Yes _____ No _____
- Do Budget Line Item amounts agree with the Budget Section of the Contract? Yes _____ No _____
- Are the expenses/report dates allowable within the scope of the Contract? Yes _____ No _____
- Have the dates been submitted before? Yes _____ No _____
- Are Budget Line Item Expenses allowable under the scope of the Contract? Yes _____ No _____
- Have any of the costs been submitted before for payment? Yes _____ No _____
- Have the total costs exceeded the Contract amount? Yes _____ No _____ Contract Amt-Total \$ _____
- Are the individuals served by this contract enrolled in WIOA Programs? Yes _____ No _____ What WIOA Program: _____

NOTES: _____

Approval for Payment Yes _____ No _____ Date: _____

Signature Title

ST. LAWRENCE COUNTY
Financial, Administrative
Review Guide
Workforce Innovation and Opportunity Act

Complaints/Grievances:

On Site EEO Review:

Contractor: _____

Street Address: _____

City: _____

Are EEO posters prominently displayed in a location frequented by WIOA applicants/participants?
Yes _____ No _____

Are facilities Handicapped accessible: Yes _____ No _____

What accommodations have been made for the Handicapped: _____

Are services provided on an equitable basis: Yes _____ No _____

ST. LAWRENCE COUNTY
Financial and Administrative
Review Guide
Workforce Innovation and Opportunity Act

Notice of Findings to Subcontractor:

The contractor will be notified within thirty (30) days of the review, if there are any findings or change in the reimbursement resulting from the review.

Administrative Process for resolution of findings resulting from the Monitor or Financial Desk Review:

The Contractor agrees to attempt to resolve disputes arising from this sub-agreement by administrative processes and negotiation in-lieu-of litigation.

1. Any disputes concerning the question of fact arising under this contract which is not settled by informal meetings shall be decided by the Grant Recipient's authorized representative who shall mail the written decision to the Contractor or otherwise furnish a copy.
2. In connection with any appeal proceeding under this clause, the Contractor/Subgrantee shall be afforded an opportunity to be heard and to offer evidence in support of its appeal. Pending final decision of a dispute hereunder, the performance of the Contractor shall proceed in accordance with the Grant Recipient's decision.
3. This "Dispute" clause does not preclude consideration of law questions in connection with decisions provided above: Provided that nothing in this contract/sub-grant shall be construed as making final the decision of any administrative official, representative or board on a question of law.

Complaints/Grievances:

The following is a part of every Contract
Non-Criminal Complaints and Grievances Procedure:

GRIEVANCE PROCEDURE:

The Contractor agrees to make available and provide information on the grievance procedure relating to the terms and conditions of employment available to the participant.

If the Contractor does not have a grievance procedure in place, he/she agrees to utilize the system established by the Grant Recipient.

DISPUTES:

The Contractor agrees to attempt to resolve disputes arising from this sub-agreement by administrative processes and negotiation in-lieu-of litigation.

1. Any disputes concerning the question of fact arising under this contract which is not settled by informal meetings shall be decided by the Grant Recipient's authorized representative who shall mail the written decision to the Contractor or otherwise furnish a copy.
2. In connection with any appeal proceeding under this clause, the Contractor/Subgrantee shall be afforded an opportunity to be heard and to offer evidence in support of its appeal. Pending final decision of a dispute hereunder, the performance of the Contractor shall proceed in accordance with the Grant Recipient's decision.
3. This "Dispute" clause does not preclude consideration of law questions in connection with decisions provided above: Provided that nothing in this contract/sub-grant shall be construed as making final the decision of any administrative official, representative or board on a question of law.
4. The Contractor agrees to pay any debt incurred while in violation of this contract.

St. Lawrence County One-Stop System
Non-Criminal Complaints and Grievances Procedure
Approved by the St. Lawrence County Workforce Investment Board: May 19, 2004
Reaffirmed by the St. Lawrence County Workforce Development Board: September 9, 2015

INTRODUCTION

The Workforce Innovation and Opportunity Act (WIOA) and the Rules and Regulations 667.600 require the establishment of a complaint/grievance procedure by each Local Area, State and direct recipient of funds under Title I.

As a participant, service provider, or interested party, this document serves to inform you of the procedure whereby you may settle any difference or non-criminal complaint that may arise, free from coercion, restraint, interference, discrimination or reprisal.

PROCEDURE

This is a multi-stage procedure, whose goal shall be to settle complaints on as low an administrative level as possible.

Time extensions beyond those noted below may be arrived by mutual agreement of the parties concerned. Should either party not adhere to the following timetable, choose not to elevate a request to the next level, fail to respond to a written request by the Program Complaint Resolution Officer within ten calendar days, or agree to satisfaction with the outcome of a complaint, the complaint will be considered resolved.

You will have up to one (1) year from the date of the incident to file the complaint. Your identity and anyone who furnishes information or assists in the investigation of the complaint will be kept confidential to the maximum extent possible, consistent with applicable law and fairness in handling the complaint. Once a complaint has been filed, the timeframes outlined in this procedure are as follows.

STEP 1: When you file your written complaint, the Program Complaint Resolution Officer (PCRO) will help you to ensure that all documents are properly filed, will gather facts, and will attempt to resolve your complaint. If your complaint can be resolved in a way that is mutually acceptable to all parties involved, the PCRO will notify each party in writing of the agreed upon resolution

The PCRO's name, address, and telephone number are as follows: **Supervisor, St. Lawrence County One-Stop Career Center, 80 State Highway 310 Suite 8, Canton NY 13617; Telephone: (315) 386-3276,**

STEP 2: If your complaint alleges a violation by the Local Area, then the Local Area Complaint Resolution Officer (LACRO) performs the actions as outlined for the Program Complaint Resolution Officer. The Local Area Complaint Resolution Officer's name, address, and telephone number are as follows: **Supervisor, St. Lawrence County One-Stop Career Center, 80 State Highway 310 Suite 8, Canton NY 13617; Telephone: (315) 386-3276,**

STEP 3: If you are unable to resolve your complaint, you may request a formal hearing. This hearing must be scheduled on or before the thirtieth (30) day of your initial complaint.

- a. You will receive by Certified Mail, notification of the date, time, and place of the hearing and will be advised that:

- The hearing may be rescheduled if you so request and the PCRO agrees.
- You have the right to be represented by an attorney, as may the PCRO.
- You may produce witnesses and/or documentary evidence, as may the PCRO.
- You and/or your attorney/representative, as may the PCRO, will be allowed to cross-examine opposing witnesses or parties in accordance with the procedurally equitable agenda explained before the hearing by the Hearing Officer.
- You may withdraw your complaint prior to the hearing. This would constitute an admission of no contest.
- You will receive a final written decision within sixty (60) days of the filing of your complaint. The decision will include a synopsis of facts, a statement of reason for the decision, a statement of remedies to be applied, a statement that all applicable procedures have been followed, and an explanation of the appeal procedure noted below.

STEP 4: If by the 60th day of the initial filing of your complaint, you have not received your written final decision, you may file a request for review by the Governor. The request must be filed within fifteen (15) days from the date on which you should have received the written decision. If you do not agree with your written final decision, you may file a request for review by the Governor. The request must be filed within ten (10) days from the date on which you receive the adverse decision. The Governor will have 30 days to issue a decision.

Your appeal should contain the same basic elements as your local complaint. These are: Your name, address and phone number; Respondent's name, address and phone number; Nature of the complaint; Your signature; Date signed; Information regarding the decision rendered at the formal hearing.

You should send the information to:

NYS Workforce Investment Act Hearing Officer
New York State Dept. of Labor
State Office Building Campus, Bldg. 12, Room 446
Albany, New York 12240

NOTE TO EMPLOYERS

If you are an employer, you may operate your own grievance system, or you may utilize the grievance system established by the St. Lawrence County One-Stop System. You must inform all participants early of the grievance procedures they are to follow, should they need them. If you opt to use your own grievance system, you must provide copies of the grievance procedure for review and comment by the PCRO to ensure that WIOA guidelines and requirements are not compromised. Your system must provide for, upon request by the complainant, a review of an employer's decision by the Local Area and the Governor, if necessary. The procedure must also have a process that allows an individual alleging a labor standard violation to submit the grievance to a binding arbitration process if a collective bargaining agreement covering the parties to the grievance provides for it.

CERTIFICATION

I certify that I have read and understand the Complaint Procedure as described above. I also certify that I am aware this document contains the name, address, and telephone number of the Program Complaint Resolution Officer.

**ST LAWRENCE COUNTY
WIOA MONTHLY PROGRAMMATIC DESK REVIEW**

Youth Service: _____

1. Case management is performed by staff of St. Lawrence County Department of Social Services, the grant recipient.
2. Case management maintains a database of participants and services exclusive from the OSOS.
3. WDB moved all aspects of participants outreach, recruitment, eligibility, verification, objective assessment and write up of the Individual Service Strategy to case management.
4. All WIOA performance tracking and outcome monitoring for youth were assigned by the WDB to the responsibility of case management.
5. Staff verify the start of delivery of service with both the provider and youth participant before enrollment into service takes place.
6. All providers must submit monthly reports (Attachment E-2) on individual youths receiving their services.
7. Modifications to original bids are reviewed and approved by the Executive Director and the WDB.
8. Executive Director makes recommendations to the WDB for renewal or renegotiating with providers based on an annual review of all of the subrecipient quarterly reviews.

**Adult and Dislocated Worker
Record Review**

Participant Name _____ OSOS ID Number _____
 Adult _____ Dislocated Worker _____ TAA _____
 Reviewer: _____ Date: _____

Data Element Validation and Eligibility	Yes	No	N/A
1. Dislocated Worker status is documented accurately with appropriate comments in OSOS			
2. Selective Service Status is documented accurately			
3. For males over 26 years of age whose status cannot be verified, a comment is entered into OSOS that the individual did not willfully avoid SS registration			
4. A copy of DOB Source documentation is available in hardcopy ,if needed, and verification of DOB with source documentation is noted in the OSOS comments			
5. If applicable, the file documents Trade Act eligibility with a copy of TA 722			
6. Employment status at participation is documented under OSOS work history and entered as a comment/case note into OSOS			
7. For employed Adults and Dislocated Workers, there is documentation that their earnings are below the LWDB self-sufficiency rate			
8. If the participant is a TANF recipient or other Public Assistance program recipient, a public assistance printout is available in hardcopy and an appropriate comment entered into OSOS			
9. If the participant is a displaced homemaker, a statement of self-attestation is available as a hardcopy with appropriate OSOS comment			
10. Validation of “date of actual qualifying dislocation” for individuals (not active UI Claimant or an Exhaustee) is documented appropriately and information about the dislocation has been entered into the work history screen in the customer detail section of OSOS with the appropriate dislocated worker category			
11. Participant has been informed of EEO Policy			
Services	Yes	No	N/A
1. Initial Assessment is complete and covers all relevant issues related to customer’s training/employment goal, work history/skills, financial situation, ability to participate in intensive/training services, and/or connection to other agencies that may assist in successfully completion of an employment/training plan			
2. Employment Plan: A local employment plan is in place and is current or for Trade Act participants, a Trade Act Plan is in place; an IEP service is entered into OSOS			
3. ITA’s are present and signed by the applicable parties when training has been approved for an Adult or Dislocated Worker			
4. The training being provided in a demand occupation and with an eligible training provider			
5. Approval of Trade Act training plans with commitment of Trade Act funds is documented			
6. OJT’s checklists and contracts are in the file and signed, all per OJT policy			
7. OJT reimburse vouchers and assessments are in the file and support the contract			
8. There is documentation in the file/or case notes to support the enrollment and progress of participant in training			
9. There is evidence that the LWIB identifies Veterans and is aware of Veterans Priority of Service			

Youth Eligibility Review

Participant Name: _____

Participant ID Number: _____

Reviewer: _____

Date: _____

Registered with Selective Service? (All Males 18 and over)

 Yes (record Sel. Service #) _____
 No
 N/A
Youth School Status at the time of Program Enrollment: A. OSY or B. ISY

A. Out of School Youth

Must be between the ages of 16 and 24: Age: _____School Status must be: Not in-school

OSY Barriers

- A school dropout
- A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter
- Subject to the juvenile or adult justice system
- A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))
- A homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))
- A runaway
- A child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement
- A foster child on behalf of whom State or Local governments are paid or has aged out of the foster care system
- Pregnant or parenting
- Is an individual with a disability
- *A recipient of a secondary school diploma or its recognized equivalent and is basic skills deficient (youth also has to be low income – see the **Low Income** section under ISY if using this for eligibility) List Low Income qualifying category here: _____
- *A recipient of a secondary school diploma or its recognized equivalent and is an English language learner (youth also has to be low income – see the **Low Income** section under ISY if using this for eligibility) List Low Income qualifying category: _____
- *Requires additional assistance to enter or complete an educational program or to secure or hold employment (**Local definition qualification:** _____) (youth also has to be low income – see the **Low Income** section under ISY if using this for eligibility) List Low Income qualifying category: _____

B. In-School Youth

Must be between the ages of 14 and 21: Age: _____

School Status must be one of the following:

- In-school, Secondary School
- In-school, Alternative School (Defined by the NYS Education Department as NYS public alternative education includes any nontraditional environment that provides a comprehensive elementary, middle or secondary curriculum)
- In-school, Post-Secondary School

Low Income Eligibility (required for all in-school youth):

Within the last 6 months youth has received or is a member of a family household that received:

- TANF
- General Assistance (State/Local) Specify: _____
- RCA – Refugee Cash Assistance
- Social Security Insurance (SSI)
- Food Stamp
- Homeless (as defined under the **Barriers** section of this document)
- Receives or is eligible to receive a free or reduced price lunch
- Is a foster child
- Has a disability (youth’s income would count as a family size of 1)
- Lives in a high-poverty area (use <http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>) to see if address qualifies.

Youth’s Address: _____

Is a member of a family household that receives a total family income that is equal to or less than the higher of:

- Lower Living Standard (Poverty Level)
- or
- 70% Lower Living Standard Income Level

****Note - If none of the allowable hard copy documentation can be obtained, then the youth can provide an applicant statement to satisfy eligibility; it should be documented in the hard file and OSOS that the case manager made an attempt to obtain all other allowable hard copy documentation, but was unsuccessful and led to the applicant statement.**

ISY Barriers

- Basic skills deficient
- An English language learner
- An offender
- A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))
- A homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11434a(2))
- A runaway
- A child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement
- A foster child on behalf of whom State or Local governments are paid or has aged out of the foster care system
- Pregnant or parenting
- Is an individual with a disability
- Requires additional assistance to enter or complete an educational program or to secure or hold employment (**Local definition qualification:** _____)