



Department of  
**Labor & Workforce  
Development**

# MONITORING GUIDE 2018





February 7, 2018

Nicholas Bishop  
Director of Compliance and Policy-Workforce Services Division  
Tennessee Department of Labor & Workforce Development  
220 French Landing Drive  
Nashville, TN 37243

**RE: TDLWD FY'18 Subrecipient Monitoring Plan Submission**

Dear Mr. Bishop,

I am pleased to inform you that the fiscal year 2018 subrecipient monitoring plan for the Tennessee Department of Labor & Workforce Development has been reviewed and approved by the Central Procurement Office. If you have any questions, please feel free to contact me at [alex.komisar@tn.gov](mailto:alex.komisar@tn.gov) or (615)532-6871.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Komisar', written over a light blue horizontal line.



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# Table of Contents

<b>I. Introduction.....</b>	<b>4</b>
<b>II. Process/Methodology.....</b>	<b>4</b>
1. Requirements of Local Workforce Development Boards to Monitor One-Stop Operators, Fiscal Agents, Subcontractors, and All Local WIOA-Funded Contracts .....	4
2. Local Workforce Development Boards and Fiscal Agents .....	5
3. Required Local Workforce Development Board Policies and Procedures.....	6
<b>III. Providing Notice of Equal Employment Opportunity and Nondiscrimination .....</b>	<b>7</b>
1. General Prohibitions on Discrimination.....	7
2. Providing Initial and Continuing Notice .....	8
3. Publications, Broadcasts, and Other Communications.....	9
<b>IV. Administrative Procedures .....</b>	<b>9</b>
1. Overall Responsibilities.....	9
2. Scheduling.....	10
3. Entrance and Exit Monitoring .....	10
<b>V. State Monitoring Process/Action Steps.....</b>	<b>11</b>
1. Time Schedules .....	11
2. Notification Process .....	11
3. Monitoring Process.....	11
4. Monitoring Report .....	11
5. Corrective Action .....	11
6. Progress Report.....	12
<b>VI. Program Descriptions.....</b>	<b>12</b>
1. Wagner Peyser.....	12
2. Senior Community Service Employment Program.....	12
3. Trade Adjustment Assistance.....	12
4. WIOA Title I (Adult, Youth and Dislocated Worker Programs) .....	13
5. Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T).....	13
6. Re-Employment Services and Eligibility Assessment (RESEA) .....	13
<b>VII. Agency Monitoring Cycle.....</b>	<b>14</b>
<b>VIII.FTE Monitoring Staff .....</b>	<b>15</b>
<b>IX. Corrective Action/Monitoring Report Procedure .....</b>	<b>16</b>

<b>X. Tennessee Department of Labor and Workforce Development Contact Information ..</b>	<b>17</b>
<b>XI. Disclaimer .....</b>	<b>17</b>
<b>XII. Total Subrecipient Population .....</b>	<b>18</b>
<b>XIII.Total Subrecipient Contracts .....</b>	<b>19</b>
<b>XIV.Subrecipient Risk Assessment .....</b>	<b>29</b>
<b>XV. Explanation of Previous Cycle Monitoring Findings .....</b>	<b>30</b>
<b>XVI.Monitoring Questionnaires .....</b>	<b>32</b>

# Monitoring Guide 2018

## I. Introduction

Monitoring and technical assistance are integral parts of the Tennessee Department of Labor and Workforce Development's (TDLWD) oversight responsibilities, as required by law. Monitoring is an essential part of program and financial management to ensure compliance with applicable laws, regulations, integrated workforce plans, provider agreements, policies, and procedures. Monitoring identifies areas of strength and weakness in operations with the intent of developing program performance. Technical assistance improves program operation and management capabilities.

TDLWD's approach to program and fiscal monitoring of each Local Workforce Development Area (LWDA) uses a combination of on-site monitoring and desktop monitoring, as prescribed in Workforce Innovation and Opportunity Act (WIOA) Section 183. Special on-site reviews may be conducted to investigate allegations of mismanagement or to clarify questionable findings during monitoring. Special reviews may or may not result in corrective action.

The State must conduct an annual on-site monitoring review of each LWDA's fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). Specific information will be requested from the local area which will be reviewed virtually prior to the on-site review. The TDLWD has established a more strategic method for programmatic and performance monitoring — through the implementation of a Virtual Case Management System (Jobs4TN) — which allows for virtual (desktop) monitoring of participant files and the upload of supporting documentation, including policies and program notes. On-site monitoring will still be conducted at a minimum of once per year. Monitoring may also occur at the discretion of TDLWD and as need is indicated by Local Workforce Development Boards (LWDBs). This flexibility allows for collaboration between the TDLWD and the LWDBs.

## II. Process/Methodology

Oversight and monitoring will focus on local areas' systems to ensure that acceptable standards for fiscal accountability, program administration, procurement, and integrated service delivery are established and in practice. In addition to the annual monitoring and required formal monitoring reviews, oversight and programmatic reviews will be conducted year-round via program management and compliance staff to ensure compliance with applicable administrative requirements — specifically identification of system strengths, weaknesses, and required corrective actions.

### 1. Requirements of Local Workforce Development Boards to Monitor One-Stop Operators, Fiscal Agents, Subcontractors, and All Local WIOA-Funded Contracts

WIOA Section 185(c) provides that:

*(c) GRANTEE INFORMATION RESPONSIBILITIES.—Each State, each local board, and each recipient (other than a subrecipient, subgrantee, or contractor of a recipient) receiving funds under this title—*

*(1) shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary;*

*(2) shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188;*

*(3) shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title; and*

*(4) shall, to the extent practicable, submit or make available (including through electronic means) any reports, records, plans, or any other data that are required to be submitted or made available, respectively, under this title.*

**Program Oversight:** As outlined in WIOA Section 107(d)(8), LWDBs are required to conduct monitoring and oversight of their subrecipients. In order to ensure LWDBs are properly conducting oversight of WIOA funds, TDLWD requires LWDBs to establish and execute tools and guides to outline how monitoring activities will be conducted. In addition to conducting monitoring and oversight as the grantee, TDLWD will also monitor LWDBs to review their monitoring activities.

Pursuant to WIOA Section 107(d)(8), the LWDB (in partnership with the Chief Local Elected Official [CLEO] for the Local Workforce Development Area [LWDA]) must:

- Conduct oversight for local youth workforce investment activities, local employment and training activities for adults and dislocated workers, and the One-Stop Delivery System in the local area;
- Ensure the appropriate use and management of funds provided for these activities; and
- For workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcomes under WIOA Section 116.

**LWDB Monitoring Plan Requirement:**

Each LWDB shall prepare and submit — to the TDLWD’s Workforce Services Division — a schedule and a policy addressing how they will conduct monitoring of their subrecipients, pursuant to 2 CFR 200.331.

**2. Local Workforce Development Boards and Fiscal Agents**

Each subrecipient of funds under WIOA Title I must conduct regular oversight and monitoring of its WIOA programs and contractors in order to:

- Determine that expenditures have been made against the proper cost categories and within the cost limitations, specified within WIOA and the regulations in this part;
- Determine whether there is programmatic compliance with WIOA, including additional applicable laws and regulations;
- Assure compliance with 2 CFR 200 (e.g. 2 CFR 200.32, Expenditures; 2 CFR 200.84, Questioned Cost; and 2 CFR 200.85, Real Property); and
- Determine compliance with the nondiscrimination, disability, and equal employment opportunity requirements of WIOA Section 188.

“Subaward” means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

“Contractor” means an entity that receives a legal instrument (i.e. contract) by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward (2 CFR 200.22). The responsibilities of a contractor are to:

- Ensure monitoring of service providers on an annual basis and at least sixty (60) days prior to the expiration of the service provider or subrecipients’ contract with its subcontractors. This requirement includes the submission of monitoring reports and resolutions to the TDLWD Compliance and Policy Unit ([workforce.board@tn.gov](mailto:workforce.board@tn.gov)).
- Provide all requested documents to the TDLWD Program Accountability Review Unit (PAR Unit) at least thirty (30) days prior to the scheduled monitoring date.
- Have documents available which were previously identified by the TDLWD as required for the on-site review. Documents must be presented in an organized manner in order to facilitate expedient examination by monitors.
- Ensure appropriate staff is available at the on-site location, and on all monitoring date(s), to assist TDLWD monitors.

### **3. Required Local Workforce Development Board Policies and Procedures**

As a part of their oversight or monitoring role, each LWDB and fiscal agent shall develop written policies and procedures to monitor WIOA-funded programs and the delivery of integrated services. LWDBs must ensure compliance at the federal, state, and local levels concerning administrative and financial requirements, policies, and procedures in order to ensure performance goals are being achieved. Policies must be approved by the LWDB. Each LWDB should have a process to review, implement, and update policies. Policies and guidance approved by the State Workforce Development Board (SWDB) can be found through the following link: <https://www.tn.gov/workforce/general-resources/program-management/program-management-redirect/workforce-services-redirect/wioa-technical-assistance.html>

These specific monitoring policies and procedures may be consolidated into one comprehensive document. However, monitoring policies may also be separated into two documents which distinctly and separately address LWDB and financial compliance requirements. Written policies and procedures shall describe:

- a. The roles and functions of LWDBs, LWDB staff, and fiscal agents in their oversight or monitoring processes;
- b. Who, by title, shall be responsible for the monitoring of each program activity;
- c. The types of reports which shall be prepared as a result of such monitoring;
- d. To whom reports will be distributed;
- e. The scope and frequency of monitoring efforts for each program activity consisting of:
  - i. Monitoring activities by using uniform monitoring tools, desk reviews, on-site visits, and telephone contacts resulting in a summarized written report;

- ii. Conducting on-site reviews of policies, plans, and procedures governing all segments of their program activities and program operations (reviews must be conducted at least once during the program year);
  - iii. Conducting pre-award financial review or on-site post-award monitoring of recipients, who have little or no workforce program experience, no later than one hundred twenty (120) days after the award of a contract;
  - iv. Monitoring program accountability of each subrecipient providing service to participants to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. **Note:** LWDBs must monitor each subrecipient once annually and no less than sixty (60) days prior to the expiration date of the contract; and
  - v. Reviewing a sample of participants' files to determine compliance with required laws, policies, plans, and procedures at the federal, state, and local levels.
- f. The methods which shall be used to monitor program activities;
- g. The methods which shall be used for procurement and financial monitoring:
- a. General procurement standards are outlined in 2 CFR 200.318:  
*The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section.*
  - b. Procurement standards used by the TDLWD are contained in the Grant Management and Subrecipient Monitoring Policy (Policy Number 2013-007), published by the Central Procurement Office. This policy can be accessed through the following link:  
[https://www.tn.gov/content/dam/tn/generalservices/documents/cpo/procurement-commission-meetings/pc-meeting-12-14-17/cpo-and-library-page/Policy2013-007\\_Grant\\_Management\\_updated12.14.17.docx](https://www.tn.gov/content/dam/tn/generalservices/documents/cpo/procurement-commission-meetings/pc-meeting-12-14-17/cpo-and-library-page/Policy2013-007_Grant_Management_updated12.14.17.docx)
- h. Who, by title, shall be responsible for ensuring corrective actions are taken when problems are found;
- i. The time-frame, in terms of days or weeks, for completion of corrective actions;
- j. Guidelines for follow-through monitoring, when necessary, to determine if corrective action has been completed; and
- k. An appeal process for disagreements.

### III. Providing Notice of Equal Employment Opportunity and Nondiscrimination

#### 1. General Prohibitions on Discrimination

*"No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries, applicants, and participants only, citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I financially assisted program or activity". (29 CFR 38.5)*



## 2. Providing Initial and Continuing Notice

- a.** All recipients of financial assistance under WIOA (excluding the beneficiaries of WIOA programs or activities) must provide initial and continuous notice that they do not discriminate on any prohibited basis.
- b.** For the purpose of equal employment opportunity and nondiscrimination regulations, recipients include but are not limited to:
  - i.** State-level agencies that administer WIOA Title I funds, whether financed in whole or in part by WIOA;
  - ii.** State Workforce Agencies;
  - iii.** State and Local Workforce Development Boards;
  - iv.** Local grant recipients;
  - v.** One-Stop Operators;
  - vi.** Service providers, including eligible training providers;
  - vii.** On-the-Job Training (OJT) employers;
  - viii.** Job Corps contractors and center operators;
  - ix.** Job Corps national training contractors;
  - x.** Outreach and admissions agencies, including Job Corps contractors that perform these functions;
  - xi.** Placement agencies, including Job Corps contractors that perform these functions; and
  - xii.** Other National Program recipients.
- c.** This non-discrimination notice must be provided to:
  - i.** Registrants, applicants, and eligible applicants/registrants;
  - ii.** Participants;
  - iii.** Applicants for employment and employees;
  - iv.** Unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
  - v.** Subrecipients that receive WIOA Title I financial assistance from the recipient; and
  - vi.** Members of the public, including those with impaired vision or hearing and those with limited English proficiency.

*Recipients must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. (29 CFR 38.34, 29 CFR 38.4, 29 CFR 38.15)*

- d.** The Equal Opportunity is the Law poster — which is available in English, Arabic, Chinese, and Spanish — must be posted prominently, in a reasonable numbers of places, in available and conspicuous physical locations and on the recipient's website.
- e.** The international symbol for accessibility should be shown directing individuals to an accessible entrance and the telephone number to call if an accommodation is needed to receive services. Information concerning these regulations can be found in the Methods of Administration, specifically Element V.
- f.** If the customer needs language assistance, and is unable to identify the language in which they need assistance, the Avanza Language Line can help to identify the language the customer is speaking. (29 CFR 38.35, 29 CFR 38.36)
- g.** The following should be observed concerning the Equal Employment Opportunity is the Law Signature Form:

- i. All individuals registered in WIOA should read, understand, and sign the complaint procedure signature form. A signed copy must be given to the individual and an additional signed copy must be placed in the individual's file.
- ii. LWDBs are required to provide the complaint procedure signature form to all current employees (regardless of whether the positions are partially or fully-funded by WIOA) and ensure that all new employees receive this form when they begin employment (again, regardless of whether the positions are partially or fully-funded by WIOA). All employees should read, understand, and sign the complaint procedure form which should then be placed in their personnel file.
- iii. Applicants for WIOA services or applicants for employment with the recipient have access to the appropriately displayed equal employment opportunity and nondiscrimination posters and information.
- iv. The complaint signature forms are printed in English. LWDBs should use Avanza Services to translate the form for use by service providers located in an area that has a substantial number of participants who require notification in other languages.
- v. Orientation presentations to new participants, new employees, and/or the general public regarding WIOA financially-funded programs must include a discussion of rights under the nondiscrimination and equal employment opportunity provisions of WIOA.

### **3. Publications, Broadcasts, and Other Communications**

Recipients must indicate that the WIOA Title I financially-assisted program or activity in question is an "equal opportunity employer/program" and that "auxiliary aids and services are available upon request to individuals with disabilities". This indication must be included in recruitment brochures and other materials that are ordinarily distributed or communicated — whether in written, oral, electronic, and/or paper format — to staff, clients, or the public at large to describe programs financially assisted under Title I of WIOA, including the requirements for participation. Where such materials indicate that the recipient may be reached by voice telephone, the materials must also prominently provide the telephone number of the text telephone (TTY) or equally effective telecommunications system — such as a relay service — used by the recipient.

*"Recipients that publish or broadcast program information in the news media must ensure that such publications and broadcasts state that the WIOA Title I-financially assisted program or activity in question is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I-financially assisted program or activity is prohibited by Federal law), and indicate that auxiliary aids and services are available upon request to individuals with disabilities." (29 CFR 38.38[b])*

## **IV. Administrative Procedures**

### **1. Overall Responsibilities**

Program and financial monitoring is performed through desktop reviews and on-site visits. During and in advance of these visits, TDLWD will request a sample of documentation to monitor activities and programs.

The TDLWD will utilize their respective WIOA Monitoring Tools — which will be distributed during the month of October, at the beginning of calendar year 2018 as this follow full WIOA implementation — to serve as the foundation for oversight/monitoring activities.

Furthermore, the State must conduct an annual on-site monitoring review of each local area's fiscal compliance with 2 CFR 200, as required by WIOA Section 184(a)(4). TDLWD will prepare and distribute these monitoring instruments for information and self-assessment purposes.

The Compliance and Policy, Fiscal, and PAR Units will review locally-provided supportive documentation to determine compliance with all applicable regulations and standards. Monitoring and reviews will take place throughout the year. For on-site monitoring, the PAR Unit will provide instructions — by separate correspondence — on required documents to be submitted to the PAR Unit, at least thirty (30) days prior to scheduled on-site monitoring visits; the PAR Unit will also supply a list of documents which must be available to monitors prior to the on-site review.

The PAR Unit will identify a Comprehensive One-Stop Center in the workforce development area where the on-site system monitoring will be conducted, and will issue monitoring reminders to the LWDB staff prior to scheduled on-site monitoring visits. Specific areas of emphasis, which are contained within the TDLWD's WIOA Monitoring Tool, include but are not limited to:

- a.** System Administration and Effectiveness of Monitoring:
  - i.** LWDB governance, bylaws, composition, minutes, re-certification, oversight and monitoring responsibilities;
  - ii.** Local agreements and contracts; and
  - iii.** Memorandums of Understanding (MOUs).
- b.** Fiscal Compliance Oversight and Monitoring:
  - i.** Fiscal agent operational policies and procedures;
  - ii.** Accounting system, entries, and documentation;
  - iii.** Procurement methods and documentation;
  - iv.** Contracts verification (i.e. purchase, rent, leases);
  - v.** Internal controls; and
  - vi.** Personnel and payroll records.
- c.** Program Administration and Effectiveness Monitoring:
  - i.** Integrated delivery of Adult and Dislocated Worker services and Youth services funded by WIOA; and
  - ii.** National Emergency Grants.

## **2. Scheduling**

The PAR Unit will prepare and distribute annual monitoring schedules near the beginning of each program year. The TDLWD's WIOA Monitoring Tools will also be provided for information and self-assessment purposes. Each program year, TDLWD staff shall publish the annual monitoring schedule to include the date and time of the on-site monitoring visit and desktop monitoring for each area. This schedule is subject to change to accommodate requests from local areas as well as address unanticipated situations affecting State staff.

## **3. Entrance and Exit Monitoring**

Prior to the start of each on-site monitoring review the PAR Unit — which may also include the Compliance and Policy Unit, Fiscal Unit, and Program Staff as needed — will hold an entrance conference call with the LWDB staff, fiscal agent, and other interested parties to establish the purpose, parameters, and time-frame of the visit. During this call, any relevant information will be discussed which may enhance the effectiveness of the review. All

previously requested documents must be available for review and distribution, including items to be retained by the monitoring team.

An exit conference call will be conducted after each TDLWD monitoring review. The exit conference call will be provided to the LWDB and CLEO to identify issues that may result in noncompliance and/or questioned costs. Additional findings and/or questioned costs may arise after the on-site review and exit conference call are concluded.

## **V. State Monitoring Process/Action Steps**

### **1. Time Schedules**

The PAR Unit and Workforce Services Division will jointly establish monitoring schedules.

### **2. Notification Process**

The PAR Unit will provide written notice to each entity being monitored at least thirty (30) days prior to a review being conducted. The written notice will inform the entity of: the dates for the review, which programs will be reviewed, the contract number of each contract that will be examined, and the estimated time of arrival.

If the date identified in the written notification is not convenient for the entity being monitored then the entity must contact the monitors immediately. The entity and the monitors will determine a mutually-satisfactory date and the review will be rescheduled. However, State monitors and TDLWD executive management reserve the right to conduct unscheduled or monitoring reviews as appropriate.

### **3. Monitoring Process**

The PAR Unit, in conjunction with the Compliance and Policy Unit, will use the annually-updated monitoring guide to conduct fiscal system and program activity reviews. The guide will be amended as regulatory changes occur.

- The monitoring review may be conducted through desktop evaluation, on-site evaluation, or through a combination of these two processes.
- PAR Unit monitors are authorized to monitor any entity receiving WIOA funds at the Comprehensive American Job Centers, including any contracts/entities utilizing WIOA funds through LWDBs. Their review may include, but is not limited to: examining program records, questioning employees, interviewing participants, and entering any site or premises which receive WIOA funds.
- Random sampling techniques will be used to perform the review of program records. Monitors will hold an exit conference with appropriate officials for each review conducted.
- After the monitors finish their examination, working papers shall be established during the review and maintained by the TDLWD.

### **4. Monitoring Report**

The PAR Unit will issue the monitoring report within thirty (30) business days from the conclusion of the monitoring review.

### **5. Corrective Action**

The monitored entity will submit a corrective action plan within thirty (30) calendar days subsequent to PAR releasing a monitoring report that requires corrective action. Corrective action must be provided within thirty (30) days of the receipt of the letter from the PAR Unit.

## **6. Progress Report**

If the initial corrective action provided to TDLWD is not accepted then the entity will submit a progress report each month until the corrective action has been accomplished.

# **VI. Program Descriptions**

## **1. Wagner Peyser**

Wagner-Peyser Act-funded workforce preparation services are an integrated component of the nation's American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name) system. They are coordinated with other adult programs under the Workforce Innovation and Opportunity Act (WIOA) to ensure that job seekers, workers, and employers have convenient and comprehensive access to a full continuum of workforce related services. The most distinguishing feature of the Wagner-Peyser Employment Service is that it is the only "universally accessible" public workforce program.

Wagner-Peyser-funded services support the development of a competitive workforce for today's global economy. Under the Wagner-Peyser Act, unemployed individuals and other job seekers obtain critical job search, assessment, and career guidance services to support them in obtaining and retaining employment. In addition, Wagner-Peyser-funded activities assist employers with building skilled, competitive workforces through recruitment assistance, employment referrals, and other workforce solutions. Activities funded under the Wagner-Peyser Act also include the development and dissemination of regional workforce information and related resources, which provide both job seekers and employers with comprehensive and accessible economic and industry data to inform workforce and economic development activities.

## **2. Senior Community Service Employment Program**

The purpose of the Senior Community Service Employment Program (SCSEP) program is to provide, foster, and promote useful part-time work opportunities (usually 20 hours per week) in community service employment activities for unemployed low-income persons who are 55 years of age and older. To the extent feasible, SCSEP assists and promotes the transition of program participants into unsubsidized employment.

## **3. Trade Adjustment Assistance**

The purpose of the Trade Adjustment Assistance (TAA) program is to provide assistance to workers adversely affected by foreign trade. Services are provided under the TAA program to enable workers to return as quickly as possible to work that will use the highest skill levels and pay the highest wages, given the workers' preexisting skill and educational levels, as well as the condition of the labor market.

The Trade Act of 1974 has been amended multiple times-most recently by the Trade Adjustment Assistance Reform Act of 2002 (Pub. L. No. 107-210) (TMRA or Trade Act of 2002); the Trade and Globalization Adjustment Assistance Act of 2009 (TGMA or Trade Act of 2009) (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5); the Trade Adjustment Assistance Extension Act of 2011 (TAAEA or Trade Act of 2011) (Title II of Pub. L. No. 112-40); and the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015 or Trade Act of 2015) (Title IV of the Trade Preferences Extension Act of 2015, Pub. L. No. 114-27). ]

Compared to the Trade Act of 2002, the Trade Act of 2011 expanded eligibility of the TAA program and replaced Alternative Trade Adjustment Assistance (ATAA) with Reemployment Trade Adjustment Assistance (RTAA), - but at the 2002 benefit levels. The TGAAA extended the TAA program through December 31, 2010, and the Omnibus Trade Act of 2010 further extended TAA through February 15, 2011. After that date, the TGAAA amendments to the Trade Act expired, and the TGAAA required the TAA program to operate under the TAARA provisions, through October 21, 2011. On this date, the TAAEA was passed, which reauthorized many of the provisions under the Trade Act of 2009, but with slight modifications. The TAAEA amendments to the Trade Act expired on December 31, 2013, and the TAAEA required the TAA program to operate under the provisions of the Trade Act of 2002, with three provisions of the Trade Act of 2011 remaining (referred to as Reversion 2014). The TAARA 2015 both amends and reauthorizes the TAA Program. The TAARA 2015 restores the worker group eligibility and benefits established by TAAEA.

The TAARA 2015 also (1) authorizes the operation of the 2015 Program and continuation of the 2002 Program, the 2009 Program, and the 2011 Program through June 30, 2021; (2) provides a 90-day transition period for Reversion 2014 Program participants to transition to the 2015 Program; (3) expands coverage of certifications of petitions filed since January 1, 2014 for 90 days; (4) requires reconsideration of negative determinations of petitions filed since that date and before the date of enactment under 2015 Act certification requirements; and (5) reauthorizes the Health Coverage Tax Credit (HCTC) program benefit for eligible TAA participants. TAARA 2015 also added new requirements to align performance reporting for the TAA Program with the requirements of the Workforce Innovation and Opportunity Act (WIOA).

#### **4. WIOA Title I (Adult, Youth and Dislocated Worker Programs)**

The Workforce Innovation and Opportunity Act of 2014 (WIOA), which supersedes the Workforce Investment Act of 1998 (WIA), authorizes formula grant programs to States to help job seekers access employment, education, training and support services to succeed in the labor market. Using a variety of methods, States provide employment and training services through a network of American Job Centers (AJC) (formerly known as One-Stop Career Centers or by another name). The WIOA programs provide employment and training programs for adults, dislocated workers, and youth, and WagnerPeyser employment services administered by the Department of Labor (DOL). The programs also provide adult education and literacy services that complement the Vocational Rehabilitation State grants awarded by the U.S. Department of Education that assist individuals with disabilities in obtaining employment and helps job seekers to achieve gainful employment. Youth employment and educational services are available to eligible out-of-school youth, ages 1 to 24, and low-income in-school youth, ages 14-21, that face barriers to employment.

#### **5. Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T)**

The objective of SNAP is to help low-income households buy the food they need for good health and to provide Employment and Training (E& T) activities.

#### **6. Re-Employment Services and Eligibility Assessment (RESEA)**

The RESEA program is designed to help unemployment insurance claimants return to work faster.

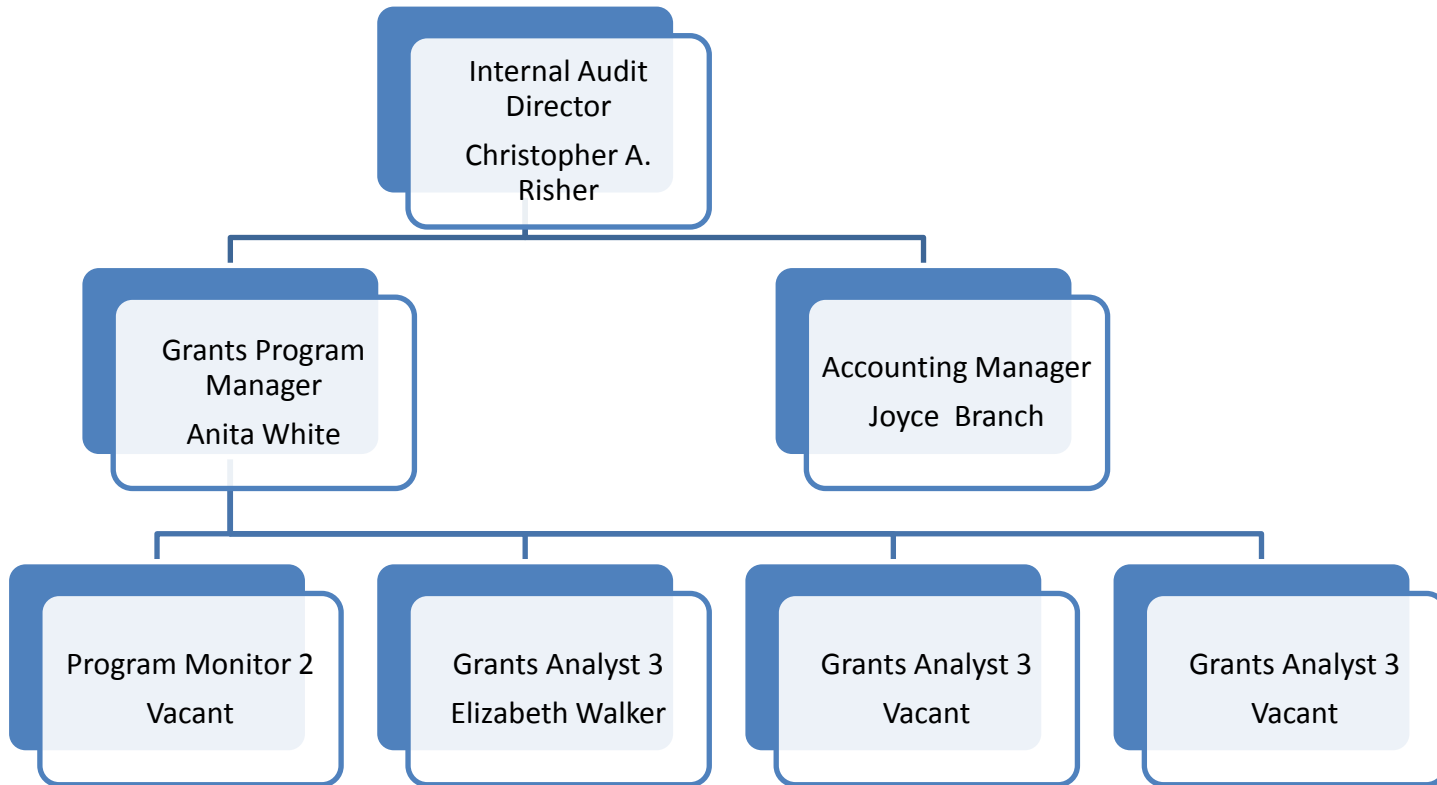
## **VII. Agency Monitoring Cycle**

Monitoring Cycle: October 1, 2017 - September 30, 2018

The Tennessee Department of Labor and Workforce Development will monitor all active contracts issued for that period and the amount of contracts allocated. Doing so fulfills the requirements under Policy 2013-007.

## VIII. FTE Monitoring Staff

TDLWD has seven (7) Full Time Equivalent (FTE) positions responsible for monitoring all WIOA programs. Currently there are three (3) full time staff involved in monitoring formula, Statewide funds, National Dislocated Worker Grant (DWG), incentive contracts, and all other WIOA contracts that are not closed.





## **IX. Corrective Action/Monitoring Report Procedure**

- 1.** Compliance and Policy Unit and Grants and Budgets Unit staff members update the TDLWD's monitoring guide based on guidelines and requirements from the General Services Monitoring Policy. The monitoring guide will include lists of contracts, fiscal and program questionnaires for all WIOA programs, and a risk assessment chart.
- 2.** The Director of the Compliance and Policy Unit forwards the updated monitoring guide, with a letter, to General Services by October 1 of each year; negotiations will take place until the monitoring guide is formally approved.
- 3.** When the monitoring guide has been approved by General Services then a copy is sent to the Communications Office of TDLWD to be placed on TDLWD's website. Furthermore, a copy is sent to the PAR Unit.
- 4.** Compliance and Policy staff receives a notice from the PAR Unit thirty (30) calendar days prior to a monitoring visit. Compliance and Policy staff enters the projected date of the review on a monitoring tracking spreadsheet (that is shared between the PAR and Compliance and Monitoring Units).
- 5.** Before issuing the final results of the monitoring report, the PAR Unit forwards the results to the Compliance and Policy Director. The Compliance and Policy Director will review and discuss the results with the Grants and Budgets Unit and Workforce Services (WFS) management.
- 6.** A report will be issued by the PAR Unit within thirty (30) business days of the completion of the review. Copies of the report will be dispersed to the following parties: the Commissioner and Deputy Commissioner of the Tennessee Department of Labor and Workforce Development, the Regional Director of the reviewed area, the Local Area Director of the reviewed area, the Administrator of Workforce Services, Assistant Administrator of Workforce Services, Compliance and Policy Director, the Director of Grants and Budgets, and other appropriate staff as necessary.
- 7.** WFS staff will forward the report to the LWDA CLEO and LWDB Board Chair.
- 8.** If there is no finding — and no corrective action is needed — Compliance and Policy staff enters the date on which the monitoring report is issued, the date on which the monitoring report is received, and the expression of "no findings reported" on the spreadsheet.
- 9.** If there is a finding, the entity monitored will submit the Corrective Action Plan (CAP) within thirty (30) calendar days after the receipt of the monitoring results. If the CAP submitted by the entity is not accepted, Compliance and Policy unit will forward a notice — offering technical assistance from the appropriate TDLWD subject matter unit/staff — to the entity.
  - The process of thirty (30) calendar day limits will continue until the entity has corrected the findings.
- 10.** If the CAP does not arrive within thirty (30) calendar days, or if the CAP is not accepted by Compliance and Policy Unit, a notice will be sent to the entity or technical assistance will be provided by the appropriate TDWLD subject matter unit/staff.
  - The process of thirty (30) calendar day limits will continue until the entity has corrected the findings.
- 11.** If findings are rendered to be significant in terms of failure to perform, or include serious infractions of oversight, or if the local area fails to properly or timely remedy the findings, TDLWD will present the matter to the SWDB under WIOA Section 107(c)(3) as it relates to the LWDB's ability to fulfill their functions.
- 12.** Compliance and Policy Unit will forward the final acceptance to the LWDA CLEO, LWDB Chair, LWDA Executive Director, and Staff to the LWDB.

## **X. Tennessee Department of Labor and Workforce Development Contact Information**

### **Program Contact Information:**

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### **Compliance and Policy Unit**

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### **Fiscal Contact Information**

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### **Contract Office**

Niveene Marcos, Fiscal Manager  
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### **Contact for Program Accountability Review (PAR) Unit**

Chris Risher, Director Internal Audit  
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## **XI. Disclaimer**

This guide outlines the steps, procedures, process, and methods utilized by TDLWD in accordance with both state and federal regulations associated with the administration of WIOA funds. In addition to the documents within this guide, TDLWD will utilize internal participant attribute sheets to review individual participant data. These attributes sheets are not included in this guide, however the steps, procedures, process, and methods outlined in this guide will govern the utilization of the review and collection of the data via the participant attribute sheets.

## XII. Total Subrecipient Population

### **Subrecipient List**

Alliance For Business And Training  
City of Memphis  
Dyersburg State Community College  
East Tennessee Human Resource Agency Inc  
Goodwill Industries - Knoxville, Inc.  
Knoxville/Knox Co CAC  
Meritan Inc  
Nashville Career Advancement Ctr  
North Tennessee Workforce Board  
Northwest Tennessee Workforce Board  
South Central Tennessee Workforce Allian  
Southeast TN Development District  
Southwest Human Resource Agency  
Tennessee Community Services Agency  
The University of Tennessee  
Upper Cumberland Human Resource Agency  
Upper Cumberland Development District  
Walters State Community College  
Workforce Essentials Inc  
Workforce Solutions

### XIII. Total Subrecipient Contracts

Subrecipient	LWDA	Fiscal year	Contract Ty	Contract Number	Project Start Date	Project End Date	Total Awarded Amount
Alliance For Business And Training	LW01	F15	APRSP	LW01F151APRSP15	4/4/2016	1/31/2017	\$ 25,000.00
Alliance For Business And Training	LW01	F15	APRSP	LW01F152APRSP15	5/2/2016	1/31/2017	\$ 25,000.00
Alliance For Business And Training	LW01	P16	RESEA	LW01P161RESEA17	4/1/2016	3/31/2017	\$ 24,003.70
Alliance For Business And Training	LW01	P15	YOUTH	LW01P151YOUTH16	4/1/2015	6/30/2017	\$ 883,176.00
Alliance For Business And Training	LW01	P15	ADULT	LW01P151ADULT16	7/1/2015	6/30/2017	\$ 74,452.00
Alliance For Business And Training	LW01	P15	DSLWK	LW01P151DSLWK16	7/1/2015	6/30/2017	\$ 110,993.00
Alliance For Business And Training	LW01	F16	ADULT	LW01F161ADULT16	10/1/2015	6/30/2017	\$ 816,397.00
Alliance For Business And Training	LW01	F16	DSLWK	LW01F161DSLWK16	10/1/2015	6/30/2017	\$ 622,768.00
Alliance For Business And Training	LW01	F16	DWRSP	LW01F161DWRSP16	7/1/2016	6/30/2017	\$ 461,897.95
Alliance For Business And Training	LW01	P16	SCSEP	LW01P161SCSEP17	7/1/2016	6/30/2017	\$ 232,835.00
Alliance For Business And Training	LW01	P15	NCSWA	LW01P151NCSWA16	7/1/2016	6/30/2017	\$ 30,000.00
Alliance For Business And Training	LW01	F15	IWRSP	LW01F153IWRSP15	2/15/2017	6/30/2017	\$ 139,867.95
Alliance For Business And Training	LW01	F15	MNSWA	LW01F152MNSWA15	2/15/2017	6/30/2017	\$ 7,361.65
Alliance For Business And Training	LW01	F17	QSNAP	LW01F171QSNAP17	1/1/2017	9/30/2017	\$ 21,734.00
Alliance For Business And Training	LW01	P16	YOUTH	LW01P161YOUTH17	4/1/2016	6/30/2018	\$ 1,024,174.00
Alliance For Business And Training	LW01	P16	ADULT	LW01P161ADULT17	7/1/2016	6/30/2018	\$ 123,194.00
Alliance For Business And Training	LW01	P16	DSLWK	LW01P161DSLWK17	7/1/2016	6/30/2018	\$ 129,194.00
Alliance For Business And Training	LW01	F17	ADULT	LW01F171ADULT17	10/1/2016	6/30/2018	\$ 883,974.00
Alliance For Business And Training	LW01	F17	DSLWK	LW01F171DSLWK17	10/1/2016	6/30/2018	\$ 842,281.00
Alliance For Business And Training	LW01	F17	RESEA	LW01F171RESEA17	2/1/2017	6/30/2018	\$ 28,300.00
Alliance For Business And Training	LW01	F17	CBRSP	LW01F171CBRSP17	6/30/2017	6/30/2018	\$ 306,192.58
Alliance For Business And Training	LW01	F17	MNSWA	LW01F171MNSWA17	6/30/2017	6/30/2018	\$ 11,500.00
Alliance For Business And Training	LW01	P17	ESIFA	LW01P171ESIFA18	7/1/2017	6/30/2018	\$ 354,770.16
Alliance For Business And Training	LW01	F16	MNSWA	LW01F161MNSWA16	7/1/2017	6/30/2018	\$ 25,446.00
Alliance For Business And Training	LW01	P17	SCSEP	LW01P171SCSEP18	7/1/2017	6/30/2018	\$ 209,415.00
Alliance For Business And Training	LW01	F18	QSNAP	LW01F181QSNAP18	10/1/2017	9/30/2018	\$ 18,036.00
Alliance For Business And Training	LW01	P17	YOUTH	LW01P171YOUTH18	4/1/2017	6/30/2019	\$ 884,511.00
Alliance For Business And Training	LW01	P17	ADULT	LW01P171ADULT18	7/1/2017	6/30/2019	\$ 113,092.00
Alliance For Business And Training	LW01	P17	DSLWK	LW01P171DSLWK18	7/1/2017	6/30/2019	\$ 139,661.00
Alliance For Business And Training	LW01	F18	ADULT	LW01F181ADULT18	10/1/2017	6/30/2019	\$ 769,712.00
Alliance For Business And Training	LW01	F18	DSLWK	LW01F181DSLWK18	10/1/2017	6/30/2019	\$ 739,031.00
City of Memphis	LW13	P16	RESEA	LW13P161RESEA17	4/1/2016	3/31/2017	\$ 24,100.00
City of Memphis	LW13	P15	YOUTH	LW13P151YOUTH16	4/1/2015	6/30/2017	\$ 3,076,001.00
City of Memphis	LW13	P15	ADULT	LW13P151ADULT16	7/1/2015	6/30/2017	\$ 237,471.00
City of Memphis	LW13	P15	DSLWK	LW13P151DSLWK16	7/1/2015	6/30/2017	\$ 419,932.00
City of Memphis	LW13	F16	ADULT	LW13F161ADULT16	10/1/2015	6/30/2017	\$ 2,603,967.00
City of Memphis	LW13	F16	DSLWK	LW13F161DSLWK16	10/1/2015	6/30/2017	\$ 2,360,717.00
City of Memphis	LW13	P15	NCSWA	LW13P151NCSWA16	7/1/2016	6/30/2017	\$ 12,219.00
City of Memphis	LW13	F15	IWRSP	LW13F152IWRSP15	2/15/2017	6/30/2017	\$ 104,202.78
City of Memphis	LW13	F15	MNSWA	LW13F152MNSWA15	2/15/2017	6/30/2017	\$ 13,857.00

City of Memphis	LW13	F17	QSNAP	LW13F171QSNAP17	1/1/2017	9/30/2017	\$	153,663.00
City of Memphis	LW13	P16	WP325	LW13P161WP32517	8/1/2016	12/31/2017	\$	65,520.00
City of Memphis	LW13	F17	RESEA	LW13F171RESEA17	2/1/2017	12/31/2017	\$	28,300.00
City of Memphis	LW13	P16	YOUTH	LW13P161YOUTH17	4/1/2016	6/30/2018	\$	3,375,575.00
City of Memphis	LW13	P16	ADULT	LW13P161ADULT17	7/1/2016	6/30/2018	\$	372,858.00
City of Memphis	LW13	P16	DSLWK	LW13P161DSLWK17	7/1/2016	6/30/2018	\$	434,118.00
City of Memphis	LW13	F17	ADULT	LW13F171ADULT17	10/1/2016	6/30/2018	\$	2,675,737.00
City of Memphis	LW13	F17	DSLWK	LW13F171DSLWK17	10/1/2016	6/30/2018	\$	1,407,508.00
City of Memphis	LW13	F17	MNSWA	LW13F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
City of Memphis	LW13	F17	CBRSP	LW13F171CBRSP17	6/30/2017	6/30/2018	\$	306,192.57
City of Memphis	LW13	P17	ESIFA	LW13P171ESIFA18	7/1/2017	6/30/2018	\$	518,005.29
City of Memphis	LW13	F16	MNSWA	LW13F162MNSWA16	7/1/2017	6/30/2018	\$	32,336.00
City of Memphis	LW13	F18	QSNAP	LW13F181QSNAP18	10/1/2017	6/30/2018	\$	62,500.00
City of Memphis	LW13	P17	YOUTH	LW13P171YOUTH18	4/1/2017	6/30/2019	\$	2,981,558.00
City of Memphis	LW13	P17	ADULT	LW13P171ADULT18	7/1/2017	6/30/2019	\$	351,270.00
City of Memphis	LW13	P17	DSLWK	LW13P171DSLWK18	7/1/2017	6/30/2019	\$	397,559.00
City of Memphis	LW13	F18	ADULT	LW13F181ADULT18	10/1/2017	6/30/2019	\$	2,390,757.00
City of Memphis	LW13	F18	DSLWK	LW13F181DSLWK18	10/1/2017	6/30/2019	\$	2,103,726.00
Dyersburg State Community College	LW12	P16	RESEA	LW12P161RESEA17	4/1/2016	3/31/2017	\$	192,800.00
Dyersburg State Community College	LW12	P15	YOUTH	LW12P151YOUTH16	4/1/2015	6/30/2017	\$	1,152,812.00
Dyersburg State Community College	LW12	P15	ADULT	LW12P151ADULT16	7/1/2015	6/30/2017	\$	96,724.00
Dyersburg State Community College	LW12	P15	DSLWK	LW12P151DSLWK16	7/1/2015	6/30/2017	\$	144,753.00
Dyersburg State Community College	LW12	P14	FTRSP	LW12P141FTRSP15	8/10/2015	6/30/2017	\$	108,816.00
Dyersburg State Community College	LW12	F16	ADULT	LW12F161ADULT16	10/1/2015	6/30/2017	\$	1,060,619.00
Dyersburg State Community College	LW12	F16	DSLWK	LW12F161DSLWK16	10/1/2015	6/30/2017	\$	797,799.00
Dyersburg State Community College	LW12	F15	APRSP	LW12F153APRSP15	11/22/2015	6/30/2017	\$	38,100.00
Dyersburg State Community College	LW12	P14	WP325	LW12P141WP32516	1/1/2016	6/30/2017	\$	71,130.42
Dyersburg State Community College	LW12	F16	DWRSP	LW12F161DWRSP16	7/1/2016	6/30/2017	\$	22,499.01
Dyersburg State Community College	LW12	F17	ADULT	LW12F171ADULT17	10/1/2016	6/30/2017	\$	919,570.84
Dyersburg State Community College	LW12	F15	IWRSP	LW12F154IWRSP15	2/15/2017	6/30/2017	\$	51,956.61
Dyersburg State Community College	LW12	F15	MNSWA	LW12F152MNSWA15	2/15/2017	6/30/2017	\$	2,597.83
Dyersburg State Community College	LW12	F17	QSNAP	LW12F171QSNAP17	1/1/2017	9/30/2017	\$	76,571.10
Dyersburg State Community College	LW12	F17	RESEA	LW12F171RESEA17	2/1/2017	12/31/2017	\$	90,666.62
Dyersburg State Community College	LW12	F17	CBRSP	LW12F171CBRSP17	6/30/2017	12/31/2017	\$	-
Dyersburg State Community College	LW12	F17	MNSWA	LW12F171MNSWA17	6/30/2017	12/31/2017	\$	-
Dyersburg State Community College	LW12	P16	YOUTH	LW12P161YOUTH17	4/1/2016	6/30/2018	\$	1,177,552.11
Dyersburg State Community College	LW12	P16	ADULT	LW12P161ADULT17	7/1/2016	6/30/2018	\$	127,209.63
Dyersburg State Community College	LW12	P16	DSLWK	LW12P161DSLWK17	7/1/2016	6/30/2018	\$	129,635.15
Dyersburg State Community College	LW12	P15	NCSWA	LW12P151NCSWA16	7/1/2016	6/30/2018	\$	115,997.22
Dyersburg State Community College	LW12	F17	DSLWK	LW12F171DSLWK17	10/1/2016	6/30/2018	\$	626,407.27
Dyersburg State Community College	LW12	F17	DWRSP	LW12F172DWRSP17	6/30/2017	6/30/2018	\$	-

Dyersburg State Community College	LW12	P17	YOUTH	LW12P171YOUTH18	4/1/2017	6/30/2019	\$	69,647.94
East Tennessee Human Resource Agency Inc	LW04	P16	RESEA	LW04P161RESEA17	4/1/2016	3/31/2017	\$	18,861.40
East Tennessee Human Resource Agency Inc	LW04	P15	YOUTH	LW04P151YOUTH16	4/1/2015	6/30/2017	\$	1,148,203.00
East Tennessee Human Resource Agency Inc	LW04	P15	ADULT	LW04P151ADULT16	7/1/2015	6/30/2017	\$	102,657.00
East Tennessee Human Resource Agency Inc	LW04	P15	DSLWK	LW04P151DSLWK16	7/1/2015	6/30/2017	\$	151,929.00
East Tennessee Human Resource Agency Inc	LW04	F16	ADULT	LW04F161ADULT16	10/1/2015	6/30/2017	\$	1,125,678.00
East Tennessee Human Resource Agency Inc	LW04	F16	DSLWK	LW04F161DSLWK16	10/1/2015	6/30/2017	\$	853,018.00
East Tennessee Human Resource Agency Inc	LW04	P16	SCSEP	LW04P161SCSEP17	7/1/2016	6/30/2017	\$	332,700.80
East Tennessee Human Resource Agency Inc	LW04	P15	NCSWA	LW04P151NCSWA16	7/1/2016	6/30/2017	\$	12,328.97
East Tennessee Human Resource Agency Inc	LW04	F15	IWRSP	LW04F152IWRSP15	2/15/2017	6/30/2017	\$	24,601.00
East Tennessee Human Resource Agency Inc	LW04	F15	MNSWA	LW04F152MNSWA15	2/15/2017	6/30/2017	\$	1,230.05
East Tennessee Human Resource Agency Inc	LW04	F17	QSNAP	LW04F171QSNAP17	2/2/2017	9/30/2017	\$	44,119.00
East Tennessee Human Resource Agency Inc	LW04	P16	YOUTH	LW04P161YOUTH17	4/1/2016	6/30/2018	\$	613,820.00
East Tennessee Human Resource Agency Inc	LW04	P16	ADULT	LW04P161ADULT17	7/1/2016	6/30/2018	\$	165,809.00
East Tennessee Human Resource Agency Inc	LW04	P16	DSLWK	LW04P161DSLWK17	7/1/2016	6/30/2018	\$	168,569.00
East Tennessee Human Resource Agency Inc	LW04	F17	ADULT	LW04F171ADULT17	10/1/2016	6/30/2018	\$	737,058.00
East Tennessee Human Resource Agency Inc	LW04	F17	DSLWK	LW04F171DSLWK17	10/1/2016	6/30/2018	\$	599,204.00
East Tennessee Human Resource Agency Inc	LW04	F17	RESEA	LW04F171RESEA17	2/1/2017	6/30/2018	\$	56,700.00
East Tennessee Human Resource Agency Inc	LW04	F17	MNSWA	LW04F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
East Tennessee Human Resource Agency Inc	LW04	F17	CBRSP	LW04F171CBRSP17	6/30/2017	6/30/2018	\$	306,192.57
East Tennessee Human Resource Agency Inc	LW04	P17	ESIFA	LW04P171ESIFA18	7/1/2017	6/30/2018	\$	151,497.65
East Tennessee Human Resource Agency Inc	LW04	P17	SCSEP	LW04P171SCSEP18	7/1/2017	6/30/2018	\$	273,151.00
East Tennessee Human Resource Agency Inc	LW04	F18	QSNAP	LW04F181QSNAP18	10/1/2017	6/30/2018	\$	9,500.00
East Tennessee Human Resource Agency Inc	LW04	P17	YOUTH	LW04P171YOUTH18	4/1/2017	6/30/2019	\$	1,042,637.00
East Tennessee Human Resource Agency Inc	LW04	P17	DSLWK	LW04P171DSLWK18	7/1/2017	6/30/2019	\$	169,509.00
East Tennessee Human Resource Agency Inc	LW04	P17	ADULT	LW04P171ADULT18	7/1/2017	6/30/2019	\$	141,905.00
East Tennessee Human Resource Agency Inc	LW04	F18	ADULT	LW04F181ADULT18	10/1/2017	6/30/2019	\$	965,813.00
East Tennessee Human Resource Agency Inc	LW04	F18	DSLWK	LW04F181DSLWK18	10/1/2017	6/30/2019	\$	896,974.00
Goodwill Industries - Knoxville, Inc.	LW14	F17	SSNAP	LW14F171SSNAP17	12/1/2016	9/30/2017	\$	29,860.00
Goodwill Industries - Knoxville, Inc.	LW14	F18	SSNAP	LW14F181SSNAP18	10/1/2017	9/30/2018	\$	274,053.00
Knoxville/Knox Co CAC	LW03	P15	YOUTH	LW03P151YOUTH16	4/1/2015	6/30/2017	\$	947,773.00
Knoxville/Knox Co CAC	LW03	P15	ADULT	LW03P151ADULT16	7/1/2015	6/30/2017	\$	65,425.00
Knoxville/Knox Co CAC	LW03	P15	DSLWK	LW03P151DSLWK16	7/1/2015	6/30/2017	\$	149,426.00
Knoxville/Knox Co CAC	LW03	F16	ADULT	LW03F161ADULT16	10/1/2015	6/30/2017	\$	717,417.00
Knoxville/Knox Co CAC	LW03	F16	DSLWK	LW03F161DSLWK16	10/1/2015	6/30/2017	\$	664,314.00
Knoxville/Knox Co CAC	LW03	F15	IWRSP	LW03F152IWRSP15	2/15/2017	6/30/2017	\$	46,519.89
Knoxville/Knox Co CAC	LW03	F15	MNSWA	LW03F152MNSWA15	2/15/2017	6/30/2017	\$	30.40
Knoxville/Knox Co CAC	LW03	F17	QSNAP	LW03F171QSNAP17	1/1/2017	9/30/2017	\$	57,116.00
Knoxville/Knox Co CAC	LW03	F16	SESWA	LW03F161SESWA16	10/1/2016	12/31/2017	\$	65,678.00
Knoxville/Knox Co CAC	LW03	P16	YOUTH	LW03P161YOUTH17	4/1/2016	6/30/2018	\$	980,711.00
Knoxville/Knox Co CAC	LW03	P16	ADULT	LW03P161ADULT17	7/1/2016	6/30/2018	\$	96,024.00

Knoxville/Knox Co CAC	LW03	P16	DSLWK	LW03P161DSLWK17	7/1/2016	6/30/2018	\$	147,526.00
Knoxville/Knox Co CAC	LW03	F17	ADULT	LW03F171ADULT17	10/1/2016	6/30/2018	\$	688,758.00
Knoxville/Knox Co CAC	LW03	F17	DSLWK	LW03F171DSLWK17	10/1/2016	6/30/2018	\$	959,021.00
Knoxville/Knox Co CAC	LW03	F17	CBRSP	LW03F171CBRSP17	6/30/2017	6/30/2018	\$	126,027.00
Knoxville/Knox Co CAC	LW03	F17	MNSWA	LW03F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Knoxville/Knox Co CAC	LW03	P17	ESIFA	LW03P171ESIFA18	7/1/2017	6/30/2018	\$	187,563.42
Knoxville/Knox Co CAC	LW03	F16	MNSWA	LW03F162MNSWA16	7/1/2017	6/30/2018	\$	26,138.00
Knoxville/Knox Co CAC	LW03	F18	QSNAP	LW03F181QSNAP18	10/1/2017	6/30/2018	\$	20,813.00
Knoxville/Knox Co CAC	LW03	P17	YOUTH	LW03P171YOUTH18	4/1/2017	6/30/2019	\$	880,349.00
Knoxville/Knox Co CAC	LW03	P17	ADULT	LW03P171ADULT18	7/1/2017	6/30/2019	\$	92,726.00
Knoxville/Knox Co CAC	LW03	P17	DSLWK	LW03P171DSLWK18	7/1/2017	6/30/2019	\$	132,621.00
Knoxville/Knox Co CAC	LW03	F18	ADULT	LW03F181ADULT18	10/1/2017	6/30/2019	\$	631,095.00
Knoxville/Knox Co CAC	LW03	F18	DSLWK	LW03F181DSLWK18	10/1/2017	6/30/2019	\$	701,778.00
Meritan Inc	LW19	P16	SCSEP	LW19P161SCSEP17	7/1/2016	6/30/2017	\$	430,095.00
Meritan Inc	LW19	P17	SCSEP	LW19P171SCSEP18	7/1/2017	6/30/2018	\$	409,726.00
Nashville Career Advancement Ctr	LW09	F15	APRSP	LW09F152APRSP15	11/22/2015	1/31/2017	\$	25,000.00
Nashville Career Advancement Ctr	LW09	F15	APRSP	LW09F153APRSP15	7/12/2016	1/31/2017	\$	25,000.00
Nashville Career Advancement Ctr	LW09	P16	RESEA	LW09P161RESEA17	4/1/2016	3/31/2017	\$	15,822.19
Nashville Career Advancement Ctr	LW09	P15	YOUTH	LW09P151YOUTH16	4/1/2015	6/30/2017	\$	2,028,122.00
Nashville Career Advancement Ctr	LW09	P15	ADULT	LW09P151ADULT16	7/1/2015	6/30/2017	\$	154,715.00
Nashville Career Advancement Ctr	LW09	P15	DSLWK	LW09P151DSLWK16	7/1/2015	6/30/2017	\$	305,516.00
Nashville Career Advancement Ctr	LW09	F16	ADULT	LW09F161ADULT16	10/1/2015	6/30/2017	\$	1,696,512.00
Nashville Career Advancement Ctr	LW09	F16	DSLWK	LW09F161DSLWK16	10/1/2015	6/30/2017	\$	1,713,895.00
Nashville Career Advancement Ctr	LW09	P15	NCSWA	LW09P151NCSWA16	7/1/2016	6/30/2017	\$	28,596.79
Nashville Career Advancement Ctr	LW09	F15	IWRSP	LW09F154IWRSP15	2/15/2017	6/30/2017	\$	100,000.00
Nashville Career Advancement Ctr	LW09	F15	MNSWA	LW09F152MNSWA15	2/15/2017	6/30/2017	\$	2,595.72
Nashville Career Advancement Ctr	LW09	F17	QSNAP	LW09F171QSNAP17	1/1/2017	9/30/2017	\$	132,000.00
Nashville Career Advancement Ctr	LW09	F17	RESEA	LW09F171RESEA17	2/1/2017	12/31/2017	\$	28,300.00
Nashville Career Advancement Ctr	LW09	P16	YOUTH	LW09P161YOUTH17	4/1/2016	6/30/2018	\$	2,007,888.00
Nashville Career Advancement Ctr	LW09	P16	ADULT	LW09P161ADULT17	7/1/2016	6/30/2018	\$	217,784.00
Nashville Career Advancement Ctr	LW09	P16	DSLWK	LW09P161DSLWK17	7/1/2016	6/30/2018	\$	375,887.00
Nashville Career Advancement Ctr	LW09	F17	ADULT	LW09F171ADULT17	10/1/2016	6/30/2018	\$	1,561,890.00
Nashville Career Advancement Ctr	LW09	F17	DSLWK	LW09F171DSLWK17	10/1/2016	6/30/2018	\$	2,445,425.00
Nashville Career Advancement Ctr	LW09	F17	MNSWA	LW09F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Nashville Career Advancement Ctr	LW09	F17	CBRSP	LW09F171CBRSP17	6/30/2017	6/30/2018	\$	306,192.57
Nashville Career Advancement Ctr	LW09	P17	ESIFA	LW09P171ESIFA18	7/1/2017	6/30/2018	\$	436,672.11
Nashville Career Advancement Ctr	LW09	F16	MNSWA	LW09F162MNSWA16	7/1/2017	6/30/2018	\$	62,967.00
Nashville Career Advancement Ctr	LW09	F18	QSNAP	LW09F181QSNAP18	10/1/2017	6/30/2018	\$	23,509.00
Nashville Career Advancement Ctr	LW09	P17	YOUTH	LW09P171YOUTH18	4/1/2017	6/30/2019	\$	1,794,243.00
Nashville Career Advancement Ctr	LW09	P17	ADULT	LW09P171ADULT18	7/1/2017	6/30/2019	\$	207,790.00
Nashville Career Advancement Ctr	LW09	P17	DSLWK	LW09P171DSLWK18	7/1/2017	6/30/2019	\$	322,313.00

Nashville Career Advancement Ctr	LW09	F18	ADULT	LW09F181ADULT18	10/1/2017	6/30/2019	\$	1,414,224.00
Nashville Career Advancement Ctr	LW09	F18	DSLWK	LW09F181DSLWK18	10/1/2017	6/30/2019	\$	1,705,556.00
North Tennessee Workforce Board	LW08	F15	LATAA	LW08F152LATAA15	7/1/2017	9/30/2017	\$	50,334.76
North Tennessee Workforce Board	LW08	F17	MNSWA	LW08F172MNSWA17	7/1/2017	12/31/2017	\$	11,500.00
North Tennessee Workforce Board	LW08	F16	MNSWA	LW08F163MNSWA16	7/1/2017	6/30/2018	\$	39,904.00
North Tennessee Workforce Board	LW08	F17	DWRSP	LW08F173DWRSP17	7/1/2017	6/30/2018	\$	250,000.00
North Tennessee Workforce Board	LW08	P17	ESIFA	LW08P171ESIFA18	7/1/2017	6/30/2018	\$	217,836.11
North Tennessee Workforce Board	LW08	F17	CBRSP	LW08F174CBRSP17	7/1/2017	6/30/2018	\$	219,362.00
North Tennessee Workforce Board	LW08	P16	WP325	LW08P161WP32517	7/1/2017	6/30/2018	\$	369,972.02
North Tennessee Workforce Board	LW08	F17	ADULT	LW08F172ADULT17	7/1/2017	6/30/2018	\$	240,780.43
North Tennessee Workforce Board	LW08	F17	DSLWK	LW08F172DSLWK17	7/1/2017	6/30/2018	\$	363,747.52
North Tennessee Workforce Board	LW08	P16	YOUTH	LW08P162YOUTH17	7/1/2017	6/30/2018	\$	87,376.15
North Tennessee Workforce Board	LW08	F16	JCSWA	LW08F162JCSWA16	7/1/2017	6/30/2018	\$	93,781.57
North Tennessee Workforce Board	LW08	P15	SSRSP	LW08P152SSRSP16	7/1/2017	6/30/2018	\$	198,136.75
North Tennessee Workforce Board	LW08	F17	RESEA	LW08F172RESEA17	7/1/2017	6/30/2018	\$	85,000.23
North Tennessee Workforce Board	LW08	F18	QSNAP	LW08F181QSNAP18	10/1/2017	6/30/2018	\$	16,897.00
North Tennessee Workforce Board	LW08	F16	LATAA	LW08F161LATAA16	9/1/2017	9/30/2018	\$	245,000.00
North Tennessee Workforce Board	LW08	P17	YOUTH	LW08P172YOUTH18	7/1/2017	6/30/2019	\$	1,026,746.85
North Tennessee Workforce Board	LW08	P17	ADULT	LW08P171ADULT18	7/1/2017	6/30/2019	\$	131,388.00
North Tennessee Workforce Board	LW08	P17	DSLWK	LW08P171DSLWK18	7/1/2017	6/30/2019	\$	216,891.00
North Tennessee Workforce Board	LW08	F18	ADULT	LW08F181ADULT18	10/1/2017	6/30/2019	\$	894,230.00
North Tennessee Workforce Board	LW08	F18	DSLWK	LW08F181DSLWK18	10/1/2017	6/30/2019	\$	1,147,703.00
Northwest Tennessee Workforce Board	LW12	F17	QSNAP	LW12F172QSNAP17	7/1/2017	9/30/2017	\$	37,962.40
Northwest Tennessee Workforce Board	LW12	F17	DSLWK	LW12F172DSLWK17	7/1/2017	6/30/2018	\$	385,569.73
Northwest Tennessee Workforce Board	LW12	F16	MNSWA	LW12F162MNSWA16	7/1/2017	6/30/2018	\$	31,287.00
Northwest Tennessee Workforce Board	LW12	F17	DWRSP	LW12F173DWRSP17	7/1/2017	6/30/2018	\$	307,500.00
Northwest Tennessee Workforce Board	LW12	P16	ADULT	LW12P162ADULT17	7/1/2017	6/30/2018	\$	26,372.37
Northwest Tennessee Workforce Board	LW12	F17	MNSWA	LW12F172MNSWA17	7/1/2017	6/30/2018	\$	11,500.00
Northwest Tennessee Workforce Board	LW12	P16	YOUTH	LW12P162YOUTH17	7/1/2017	6/30/2018	\$	103,699.89
Northwest Tennessee Workforce Board	LW12	F17	CBRSP	LW12F174CBRSP17	7/1/2017	6/30/2018	\$	306,192.57
Northwest Tennessee Workforce Board	LW12	F17	ADULT	LW12F172ADULT17	7/1/2017	6/30/2018	\$	182,683.16
Northwest Tennessee Workforce Board	LW12	F17	RESEA	LW12F172RESEA17	7/1/2017	6/30/2018	\$	136,033.38
Northwest Tennessee Workforce Board	LW12	P17	ESIFA	LW12P171ESIFA18	7/1/2017	6/30/2018	\$	281,344.29
Northwest Tennessee Workforce Board	LW12	P15	NCSWA	LW12P152NCSWA16	7/1/2017	6/30/2018	\$	89,002.78
Northwest Tennessee Workforce Board	LW12	P16	DSLWK	LW12P162DSLWK17	7/1/2017	6/30/2018	\$	25,267.85
Northwest Tennessee Workforce Board	LW12	F18	QSNAP	LW12F181QSNAP18	10/1/2017	6/30/2018	\$	18,747.00
Northwest Tennessee Workforce Board	LW12	P17	ADULT	LW12P171ADULT18	7/1/2017	6/30/2019	\$	134,403.00
Northwest Tennessee Workforce Board	LW12	P17	DSLWK	LW12P171DSLWK18	7/1/2017	6/30/2019	\$	147,624.00
Northwest Tennessee Workforce Board	LW12	P17	YOUTH	LW12P172YOUTH18	7/1/2017	6/30/2019	\$	983,230.06
Northwest Tennessee Workforce Board	LW12	F18	ADULT	LW12F181ADULT18	10/1/2017	6/30/2019	\$	914,751.00
Northwest Tennessee Workforce Board	LW12	F18	DSLWK	LW12F181DSLWK18	10/1/2017	6/30/2019	\$	781,166.00



South Central Tennessee Workforce Allian	LW10	P14	WP325	LW10P141WP32516	10/1/2015	3/31/2017	\$	138,512.03
South Central Tennessee Workforce Allian	LW10	F16	IWSWA	LW10F161IWSWA16	1/4/2016	3/31/2017	\$	36,640.00
South Central Tennessee Workforce Allian	LW10	P16	RESEA	LW10P161RESEA17	4/1/2016	3/31/2017	\$	48,711.83
South Central Tennessee Workforce Allian	LW10	P15	YOUTH	LW10P151YOUTH16	4/1/2015	6/30/2017	\$	658,079.00
South Central Tennessee Workforce Allian	LW10	P15	ADULT	LW10P151ADULT16	7/1/2015	6/30/2017	\$	54,250.00
South Central Tennessee Workforce Allian	LW10	P15	DSLWK	LW10P151DSLWK16	7/1/2015	6/30/2017	\$	77,210.00
South Central Tennessee Workforce Allian	LW10	F16	ADULT	LW10F161ADULT16	10/1/2015	6/30/2017	\$	594,874.00
South Central Tennessee Workforce Allian	LW10	F16	DSLWK	LW10F161DSLWK16	10/1/2015	6/30/2017	\$	425,537.00
South Central Tennessee Workforce Allian	LW10	F15	DWRSP	LW10F152DWRSP15	10/1/2015	6/30/2017	\$	117,817.60
South Central Tennessee Workforce Allian	LW10	P15	NCSWA	LW10P151NCSWA16	7/1/2016	6/30/2017	\$	30,000.00
South Central Tennessee Workforce Allian	LW10	F16	DWRSP	LW10F161DWRSP16	9/1/2016	6/30/2017	\$	249,480.00
South Central Tennessee Workforce Allian	LW10	F15	IWRSP	LW10F153IWRSP15	2/15/2017	6/30/2017	\$	49,340.00
South Central Tennessee Workforce Allian	LW10	F15	MNSWA	LW10F152MNSWA15	2/15/2017	6/30/2017	\$	2,600.22
South Central Tennessee Workforce Allian	LW10	F17	QSNAP	LW10F171QSNAP17	1/1/2017	9/30/2017	\$	12,300.00
South Central Tennessee Workforce Allian	LW10	F16	DWRSP	LW10F162DWRSP16	3/2/2017	9/30/2017	\$	132,185.58
South Central Tennessee Workforce Allian	LW10	P16	YOUTH	LW10P161YOUTH17	4/1/2016	6/30/2018	\$	652,256.00
South Central Tennessee Workforce Allian	LW10	P16	ADULT	LW10P161ADULT17	7/1/2016	6/30/2018	\$	76,996.00
South Central Tennessee Workforce Allian	LW10	P16	DSLWK	LW10P161DSLWK17	7/1/2016	6/30/2018	\$	85,017.00
South Central Tennessee Workforce Allian	LW10	F17	ADULT	LW10F171ADULT17	10/1/2016	6/30/2018	\$	489,427.00
South Central Tennessee Workforce Allian	LW10	F17	DSLWK	LW10F171DSLWK17	10/1/2016	6/30/2018	\$	520,314.00
South Central Tennessee Workforce Allian	LW10	F17	RESEA	LW10F171RESEA17	2/1/2017	6/30/2018	\$	85,000.00
South Central Tennessee Workforce Allian	LW10	F17	MNSWA	LW10F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
South Central Tennessee Workforce Allian	LW10	F17	CBRSP	LW10F171CBRSP17	6/30/2017	6/30/2018	\$	111,870.00
South Central Tennessee Workforce Allian	LW10	F16	MNSWA	LW10F162MNSWA16	7/1/2017	6/30/2018	\$	14,106.00
South Central Tennessee Workforce Allian	LW10	P17	ESIFA	LW10P171ESIFA18	7/1/2017	6/30/2018	\$	182,484.39
South Central Tennessee Workforce Allian	LW10	F18	QSNAP	LW10F181QSNAP18	10/1/2017	6/30/2018	\$	12,600.00
South Central Tennessee Workforce Allian	LW10	P17	YOUTH	LW10P171YOUTH18	4/1/2017	6/30/2019	\$	519,704.00
South Central Tennessee Workforce Allian	LW10	P17	ADULT	LW10P171ADULT18	7/1/2017	6/30/2019	\$	65,320.00
South Central Tennessee Workforce Allian	LW10	P17	DSLWK	LW10P171DSLWK18	7/1/2017	6/30/2019	\$	89,252.00
South Central Tennessee Workforce Allian	LW10	F18	ADULT	LW10F181ADULT18	10/1/2017	6/30/2019	\$	444,573.00
South Central Tennessee Workforce Allian	LW10	F18	DSLWK	LW10F181DSLWK18	10/1/2017	6/30/2019	\$	472,289.00
Southeast TN Development District	LW05	P15	YOUTH	LW05P151YOUTH16	4/1/2015	6/30/2017	\$	1,518,705.00
Southeast TN Development District	LW05	P15	ADULT	LW05P151ADULT16	7/1/2015	6/30/2017	\$	122,706.00
Southeast TN Development District	LW05	P15	DSLWK	LW05P151DSLWK16	7/1/2015	6/30/2017	\$	204,711.00
Southeast TN Development District	LW05	F16	ADULT	LW05F161ADULT16	10/1/2015	6/30/2017	\$	1,345,516.00
Southeast TN Development District	LW05	F16	DSLWK	LW05F161DSLWK16	10/1/2015	6/30/2017	\$	1,147,990.00
Southeast TN Development District	LW05	P15	NCSWA	LW05P151NCSWA16	7/1/2016	6/30/2017	\$	30,000.00
Southeast TN Development District	LW05	F17	QSNAP	LW05F171QSNAP17	1/1/2017	9/30/2017	\$	14,321.00
Southeast TN Development District	LW05	F17	RESEA	LW05F171RESEA17	2/1/2017	12/31/2017	\$	56,700.00
Southeast TN Development District	LW05	P16	YOUTH	LW05P161YOUTH17	4/1/2016	6/30/2018	\$	1,633,132.00
Southeast TN Development District	LW05	P16	ADULT	LW05P161ADULT17	7/1/2016	6/30/2018	\$	188,696.00

Southeast TN Development District	LW05	P16	DSLWK	LW05P161DSLWK17	7/1/2016	6/30/2018	\$	223,291.00
Southeast TN Development District	LW05	F17	ADULT	LW05F171ADULT17	10/1/2016	6/30/2018	\$	1,353,936.00
Southeast TN Development District	LW05	F17	DSLWK	LW05F171DSLWK17	10/1/2016	6/30/2018	\$	1,457,117.00
Southeast TN Development District	LW05	F17	CBRSP	LW05F171CBRSP17	6/30/2017	6/30/2018	\$	65,746.00
Southeast TN Development District	LW05	F17	MNSWA	LW05F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Southeast TN Development District	LW05	P17	ESIFA	LW05P171ESIFA18	7/1/2017	6/30/2018	\$	440,674.11
Southeast TN Development District	LW05	F16	MNSWA	LW05F162MNSWA16	7/1/2017	6/30/2018	\$	42,505.00
Southeast TN Development District	LW05	F18	QSNAP	LW05F181QSNAP18	10/1/2017	6/30/2018	\$	8,285.00
Southeast TN Development District	LW05	P17	YOUTH	LW05P171YOUTH18	4/1/2017	6/30/2019	\$	1,393,891.00
Southeast TN Development District	LW05	P17	ADULT	LW05P171ADULT18	7/1/2017	6/30/2019	\$	171,348.00
Southeast TN Development District	LW05	P17	DSLWK	LW05P171DSLWK18	7/1/2017	6/30/2019	\$	230,270.00
Southeast TN Development District	LW05	F18	ADULT	LW05F181ADULT18	10/1/2017	6/30/2019	\$	1,166,204.00
Southeast TN Development District	LW05	F18	DSLWK	LW05F181DSLWK18	10/1/2017	6/30/2019	\$	1,218,500.00
Southwest Human Resource Agency	LW11	F15	APRSP	LW11F152APRSP15	7/12/2016	1/31/2017	\$	18,200.00
Southwest Human Resource Agency	LW11	P16	RESEA	LW11P161RESEA17	4/1/2016	3/31/2017	\$	48,200.00
Southwest Human Resource Agency	LW11	P15	YOUTH	LW11P151YOUTH16	4/1/2015	6/30/2017	\$	715,734.32
Southwest Human Resource Agency	LW11	P15	ADULT	LW11P151ADULT16	7/1/2015	6/30/2017	\$	65,703.00
Southwest Human Resource Agency	LW11	P15	DSLWK	LW11P151DSLWK16	7/1/2015	6/30/2017	\$	99,397.00
Southwest Human Resource Agency	LW11	F16	ADULT	LW11F161ADULT16	10/1/2015	6/30/2017	\$	720,457.00
Southwest Human Resource Agency	LW11	F16	DSLWK	LW11F161DSLWK16	10/1/2015	6/30/2017	\$	558,377.00
Southwest Human Resource Agency	LW11	P16	SCSEP	LW11P161SCSEP17	7/1/2016	6/30/2017	\$	197,994.00
Southwest Human Resource Agency	LW11	P15	NCSWA	LW11P151NCSWA16	7/1/2016	6/30/2017	\$	29,971.47
Southwest Human Resource Agency	LW11	F15	IWRSP	LW11F153IWRSP15	2/15/2017	6/30/2017	\$	63,200.00
Southwest Human Resource Agency	LW11	F15	MNSWA	LW11F152MNSWA15	2/15/2017	6/30/2017	\$	3,461.00
Southwest Human Resource Agency	LW11	F17	QSNAP	LW11F171QSNAP17	1/1/2017	9/30/2017	\$	28,664.82
Southwest Human Resource Agency	LW11	P16	YOUTH	LW11P161YOUTH17	4/1/2016	6/30/2018	\$	795,387.32
Southwest Human Resource Agency	LW11	P16	ADULT	LW11P161ADULT17	7/1/2016	6/30/2018	\$	103,549.00
Southwest Human Resource Agency	LW11	P16	DSLWK	LW11P161DSLWK17	7/1/2016	6/30/2018	\$	105,978.00
Southwest Human Resource Agency	LW11	F17	ADULT	LW11F171ADULT17	10/1/2016	6/30/2018	\$	665,795.88
Southwest Human Resource Agency	LW11	F17	DSLWK	LW11F171DSLWK17	10/1/2016	6/30/2018	\$	402,944.88
Southwest Human Resource Agency	LW11	F17	RESEA	LW11F171RESEA17	2/1/2017	6/30/2018	\$	56,700.00
Southwest Human Resource Agency	LW11	F17	MNSWA	LW11F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Southwest Human Resource Agency	LW11	F17	CBRSP	LW11F171CBRSP17	6/30/2017	6/30/2018	\$	306,192.57
Southwest Human Resource Agency	LW11	F16	MNSWA	LW11F162MNSWA16	7/1/2017	6/30/2018	\$	5,134.00
Southwest Human Resource Agency	LW11	P17	ESIFA	LW11P171ESIFA18	7/1/2017	6/30/2018	\$	246,367.74
Southwest Human Resource Agency	LW11	P17	SCSEP	LW11P171SCSEP18	7/1/2017	6/30/2018	\$	182,100.00
Southwest Human Resource Agency	LW11	F16	MNSWA	LW11F163MNSWA16	10/1/2017	6/30/2018	\$	2,000.00
Southwest Human Resource Agency	LW11	F16	JCSWA	LW11F164JCSWA16	10/1/2017	6/30/2018	\$	40,000.00
Southwest Human Resource Agency	LW11	F18	QSNAP	LW11F181QSNAP18	10/1/2017	6/30/2018	\$	11,943.00
Southwest Human Resource Agency	LW11	P17	YOUTH	LW11P171YOUTH18	4/1/2017	6/30/2019	\$	709,343.88
Southwest Human Resource Agency	LW11	P17	ADULT	LW11P171ADULT18	7/1/2017	6/30/2019	\$	93,250.00

Southwest Human Resource Agency	LW11	P17	DSLWK	LW11P171DSLWK18	7/1/2017	6/30/2019	\$	102,373.00
Southwest Human Resource Agency	LW11	F18	ADULT	LW11F181ADULT18	10/1/2017	6/30/2019	\$	634,665.00
Southwest Human Resource Agency	LW11	F18	DSLWK	LW11F181DSLWK18	10/1/2017	6/30/2019	\$	541,720.00
Tennessee Community Services Agency	LW20	P16	SCSEP	LW20P161SCSEP17	7/1/2016	6/30/2017	\$	244,569.00
Tennessee Community Services Agency	LW20	P17	SCSEP	LW20P171SCSEP18	7/1/2017	6/30/2018	\$	254,941.00
The University of Tennessee	LW21	F17	QSNAP	LW21F171QSNAP17	8/1/2017	9/30/2017	\$	58,534.00
The University of Tennessee	LW21	F18	QSNAP	LW21F181QSNAP18	10/1/2017	9/30/2018	\$	72,000.00
The University of Tennessee	LW21	F18	SSNAP	LW21F181SSNAP18	1/1/2018	9/30/2018	\$	425,531.00
Upper Cumberland Human Resource Agency	LW07	P16	RESEA	LW07P161RESEA17	4/1/2016	3/31/2017	\$	30,296.45
Upper Cumberland Human Resource Agency	LW07	P15	YOUTH	LW07P151YOUTH16	4/1/2015	6/30/2017	\$	624,888.20
Upper Cumberland Human Resource Agency	LW07	P15	ADULT	LW07P151ADULT16	7/1/2015	6/30/2017	\$	54,164.00
Upper Cumberland Human Resource Agency	LW07	P15	DSLWK	LW07P151DSLWK16	7/1/2015	6/30/2017	\$	79,252.00
Upper Cumberland Human Resource Agency	LW07	F16	ADULT	LW07F161ADULT16	10/1/2015	6/30/2017	\$	593,925.00
Upper Cumberland Human Resource Agency	LW07	F16	DSLWK	LW07F161DSLWK16	10/1/2015	6/30/2017	\$	444,110.00
Upper Cumberland Human Resource Agency	LW07	P16	SCSEP	LW07P161SCSEP17	7/1/2016	6/30/2017	\$	207,959.00
Upper Cumberland Human Resource Agency	LW07	P15	NCSWA	LW07P151NCSWA16	7/1/2016	6/30/2017	\$	26,732.34
Upper Cumberland Human Resource Agency	LW07	F15	IWRSP	LW07F152IWRSP15	2/15/2017	6/30/2017	\$	19,532.50
Upper Cumberland Human Resource Agency	LW07	F15	MNSWA	LW07F152MNSWA15	2/15/2017	6/30/2017	\$	1,830.00
Upper Cumberland Human Resource Agency	LW07	F17	QSNAP	LW07F171QSNAP17	1/1/2017	9/30/2017	\$	13,627.43
Upper Cumberland Human Resource Agency	LW07	P16	YOUTH	LW07P161YOUTH17	4/1/2016	6/30/2018	\$	398,213.00
Upper Cumberland Human Resource Agency	LW07	P16	ADULT	LW07P161ADULT17	7/1/2016	6/30/2018	\$	90,214.00
Upper Cumberland Human Resource Agency	LW07	P16	DSLWK	LW07P161DSLWK17	7/1/2016	6/30/2018	\$	85,359.00
Upper Cumberland Human Resource Agency	LW07	F17	ADULT	LW07F171ADULT17	10/1/2016	6/30/2018	\$	527,464.00
Upper Cumberland Human Resource Agency	LW07	F17	DSLWK	LW07F171DSLWK17	10/1/2016	6/30/2018	\$	240,035.00
Upper Cumberland Human Resource Agency	LW07	F17	RESEA	LW07F171RESEA17	2/1/2017	6/30/2018	\$	56,700.00
Upper Cumberland Human Resource Agency	LW07	F17	MNSWA	LW07F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Upper Cumberland Human Resource Agency	LW07	F17	CBRSP	LW07F171CBRSP17	6/30/2017	6/30/2018	\$	173,955.00
Upper Cumberland Human Resource Agency	LW07	P17	ESIFA	LW07P171ESIFA18	7/1/2017	6/30/2018	\$	90,528.08
Upper Cumberland Human Resource Agency	LW07	P17	SCSEP	LW07P171SCSEP18	7/1/2017	6/30/2018	\$	182,100.00
Upper Cumberland Human Resource Agency	LW07	F18	QSNAP	LW07F181QSNAP18	10/1/2017	6/30/2018	\$	11,476.00
Upper Cumberland Human Resource Agency	LW07	P17	YOUTH	LW07P171YOUTH18	4/1/2017	6/30/2019	\$	574,389.00
Upper Cumberland Human Resource Agency	LW07	P17	ADULT	LW07P171ADULT18	7/1/2017	6/30/2019	\$	75,219.00
Upper Cumberland Human Resource Agency	LW07	P17	DSLWK	LW07P171DSLWK18	7/1/2017	6/30/2019	\$	76,487.00
Upper Cumberland Human Resource Agency	LW07	F18	ADULT	LW07F181ADULT18	10/1/2017	6/30/2019	\$	511,945.00
Upper Cumberland Human Resource Agency	LW07	F18	DSLWK	LW07F181DSLWK18	10/10/2017	6/30/2019	\$	404,729.00
Walters State Community College	LW02	P16	RESEA	LW02P161RESEA17	4/1/2016	3/31/2017	\$	48,200.00
Walters State Community College	LW02	P15	YOUTH	LW02P151YOUTH16	4/1/2015	6/30/2017	\$	1,212,244.00
Walters State Community College	LW02	P15	ADULT	LW02P151ADULT16	7/1/2015	6/30/2017	\$	107,644.00
Walters State Community College	LW02	P15	DSLWK	LW02P151DSLWK16	7/1/2015	6/30/2017	\$	151,942.00
Walters State Community College	LW02	F16	ADULT	LW02F161ADULT16	10/1/2015	6/30/2017	\$	1,180,361.00
Walters State Community College	LW02	F16	DSLWK	LW02F161DSLWK16	10/1/2015	6/30/2017	\$	537,129.85

Walters State Community College	LW02	P15	NCSWA	LW02P151NCSWA16	7/1/2016	6/30/2017	\$	12,500.00
Walters State Community College	LW02	F15	IWRSP	LW02F153IWRSP15	2/15/2017	6/30/2017	\$	92,196.71
Walters State Community College	LW02	F15	MNSWA	LW02F152MNSWA15	2/15/2017	6/30/2017	\$	4,622.34
Walters State Community College	LW02	F17	QSNAP	LW02F171QSNAP17	1/1/2017	9/30/2017	\$	40,622.00
Walters State Community College	LW02	F17	DRNEG	LW02F171DRNEG17	1/19/2017	12/31/2017	\$	1,900,000.00
Walters State Community College	LW02	P16	YOUTH	LW02P161YOUTH17	4/1/2016	6/30/2018	\$	1,370,474.00
Walters State Community College	LW02	P16	ADULT	LW02P161ADULT17	7/1/2016	6/30/2018	\$	173,416.00
Walters State Community College	LW02	P16	DSLWK	LW02P161DSLWK17	7/1/2016	6/30/2018	\$	170,410.00
Walters State Community College	LW02	F17	ADULT	LW02F171ADULT17	10/1/2016	6/30/2018	\$	1,244,472.00
Walters State Community College	LW02	F17	DSLWK	LW02F171DSLWK17	10/1/2016	6/30/2018	\$	887,872.00
Walters State Community College	LW02	F17	RESEA	LW02F171RESEA17	2/1/2017	6/30/2018	\$	56,700.00
Walters State Community College	LW02	F17	CBRSP	LW02F171CBRSP17	6/30/2017	6/30/2018	\$	149,692.00
Walters State Community College	LW02	F17	MNSWA	LW02F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Walters State Community College	LW02	P17	ESIFA	LW02P171ESIFA18	7/1/2017	6/30/2018	\$	241,359.47
Walters State Community College	LW02	F16	MNSWA	LW02F162MNSWA16	7/1/2017	6/30/2018	\$	13,856.00
Walters State Community College	LW02	F18	QSNAP	LW02F181QSNAP18	10/1/2017	6/30/2018	\$	18,537.00
Walters State Community College	LW02	P17	YOUTH	LW02P171YOUTH18	4/1/2017	6/30/2019	\$	1,073,032.00
Walters State Community College	LW02	P17	ADULT	LW02P171ADULT18	7/1/2017	6/30/2019	\$	145,358.00
Walters State Community College	LW02	P17	DSLWK	LW02P171DSLWK18	7/1/2017	6/30/2019	\$	169,891.00
Walters State Community College	LW02	F18	ADULT	LW02F181ADULT18	10/1/2017	6/30/2019	\$	989,315.00
Walters State Community College	LW02	F18	DSLWK	LW02F181DSLWK18	10/1/2017	6/30/2019	\$	898,998.00
Workforce Essentials Inc	LW08	F15	APRSP	LW08F153APRSP15	11/12/2015	1/31/2017	\$	25,000.00
Workforce Essentials Inc	LW08	P16	RESEA	LW08P161RESEA17	4/1/2016	3/31/2017	\$	120,500.00
Workforce Essentials Inc	LW08	P15	YOUTH	LW08P151YOUTH16	4/1/2015	6/30/2017	\$	1,209,084.00
Workforce Essentials Inc	LW08	P15	ADULT	LW08P151ADULT16	7/1/2015	6/30/2017	\$	100,161.00
Workforce Essentials Inc	LW08	P15	DSLWK	LW08P151DSLWK16	7/1/2015	6/30/2017	\$	186,094.00
Workforce Essentials Inc	LW08	F15	FTRSP	LW08F152FTRSP15	9/1/2015	6/30/2017	\$	68,640.00
Workforce Essentials Inc	LW08	F16	ADULT	LW08F161ADULT16	10/1/2015	6/30/2017	\$	1,098,303.00
Workforce Essentials Inc	LW08	F16	DSLWK	LW08F161DSLWK16	10/1/2015	6/30/2017	\$	1,044,264.00
Workforce Essentials Inc	LW08	P15	NCSWA	LW08P151NCSWA16	7/1/2016	6/30/2017	\$	30,000.00
Workforce Essentials Inc	LW08	F15	IWRSP	LW08F154IWRSP15	2/15/2017	6/30/2017	\$	56,459.89
Workforce Essentials Inc	LW08	F15	MNSWA	LW08F152MNSWA15	2/15/2017	6/30/2017	\$	2,822.99
Workforce Essentials Inc	LW08	P15	SSRSP	LW08P151SSRSP16	9/1/2015	8/31/2017	\$	193,336.25
Workforce Essentials Inc	LW08	F15	LATAA	LW08F151LATAA17	1/1/2017	9/30/2017	\$	73,231.40
Workforce Essentials Inc	LW08	F17	QSNAP	LW08F171QSNAP17	1/1/2017	9/30/2017	\$	20,110.00
Workforce Essentials Inc	LW08	F17	RESEA	LW08F171RESEA17	2/1/2017	12/31/2017	\$	56,699.77
Workforce Essentials Inc	LW08	F17	CBRSP	LW08F171CBRSP17	6/30/2017	12/31/2017	\$	-
Workforce Essentials Inc	LW08	F17	MNSWA	LW08F171MNSWA17	6/30/2017	12/31/2017	\$	-
Workforce Essentials Inc	LW08	P16	YOUTH	LW08P161YOUTH17	4/1/2016	6/30/2018	\$	1,221,773.85
Workforce Essentials Inc	LW08	F16	JCSWA	LW08F161JCSWA16	7/1/2016	6/30/2018	\$	90,198.43
Workforce Essentials Inc	LW08	P16	ADULT	LW08P161ADULT17	7/1/2016	6/30/2018	\$	155,114.00

Workforce Essentials Inc	LW08	P16	DSLWK	LW08P161DSLWK17	7/1/2016	6/30/2018	\$	226,264.00
Workforce Essentials Inc	LW08	F17	ADULT	LW08F171ADULT17	10/1/2016	6/30/2018	\$	871,918.57
Workforce Essentials Inc	LW08	F17	DSLWK	LW08F171DSLWK17	10/1/2016	6/30/2018	\$	1,113,816.48
Workforce Essentials Inc	LW08	F17	DWRSP	LW08F172DWRSP17	6/30/2017	6/30/2018	\$	-
Workforce Essentials Inc	LW08	P17	YOUTH	LW08P171YOUTH18	4/1/2017	6/30/2019	\$	14,564.15
Workforce Solutions	LW06	P16	RESEA	LW06P161RESEA17	4/1/2016	3/31/2017	\$	24,100.00
Workforce Solutions	LW06	P15	YOUTH	LW06P151YOUTH16	4/1/2015	6/30/2017	\$	516,410.00
Workforce Solutions	LW06	P15	ADULT	LW06P151ADULT16	7/1/2015	6/30/2017	\$	45,002.00
Workforce Solutions	LW06	P15	DSLWK	LW06P151DSLWK16	7/1/2015	6/30/2017	\$	65,823.00
Workforce Solutions	LW06	F16	ADULT	LW06F161ADULT16	10/1/2015	6/30/2017	\$	493,469.00
Workforce Solutions	LW06	F16	DSLWK	LW06F161DSLWK16	10/1/2015	6/30/2017	\$	362,781.00
Workforce Solutions	LW06	P15	NCSWA	LW06P151NCSWA16	7/1/2016	6/30/2017	\$	30,000.00
Workforce Solutions	LW06	F15	IWRSP	LW06F152IWRSP15	2/15/2017	6/30/2017	\$	30,112.75
Workforce Solutions	LW06	F15	MNSWA	LW06F152MNSWA15	2/15/2017	6/30/2017	\$	1,584.89
Workforce Solutions	LW06	F17	QSNAP	LW06F171QSNAP17	1/1/2017	9/30/2017	\$	4,650.00
Workforce Solutions	LW06	F17	RESEA	LW06F171RESEA17	2/1/2017	12/31/2017	\$	28,650.00
Workforce Solutions	LW06	P16	YOUTH	LW06P161YOUTH17	4/1/2016	6/30/2018	\$	575,100.00
Workforce Solutions	LW06	P16	ADULT	LW06P161ADULT17	7/1/2016	6/30/2018	\$	71,552.00
Workforce Solutions	LW06	P16	DSLWK	LW06P161DSLWK17	7/1/2016	6/30/2018	\$	70,984.00
Workforce Solutions	LW06	F17	ADULT	LW06F171ADULT17	10/1/2016	6/30/2018	\$	513,396.00
Workforce Solutions	LW06	F17	DSLWK	LW06F171DSLWK17	10/1/2016	6/30/2018	\$	355,354.00
Workforce Solutions	LW06	F17	MNSWA	LW06F171MNSWA17	6/30/2017	6/30/2018	\$	11,500.00
Workforce Solutions	LW06	F17	CBRSP	LW06F171CBRSP17	6/30/2017	6/30/2018	\$	306,192.57
Workforce Solutions	LW06	F16	MNSWA	LW06F162MNSWA16	7/1/2017	6/30/2018	\$	5,754.00
Workforce Solutions	LW06	P17	ESIFA	LW06P171ESIFA18	7/1/2017	6/30/2018	\$	128,877.32
Workforce Solutions	LW06	F18	QSNAP	LW06F181QSNAP18	10/1/2017	6/30/2018	\$	5,000.00
Workforce Solutions	LW06	P17	YOUTH	LW06P171YOUTH18	4/1/2017	6/30/2019	\$	434,085.00
Workforce Solutions	LW06	P17	ADULT	LW06P171ADULT18	7/1/2017	6/30/2019	\$	57,889.00
Workforce Solutions	LW06	P17	DSLWK	LW06P171DSLWK18	7/1/2017	6/30/2019	\$	98,373.00
Workforce Solutions	LW06	F18	ADULT	LW06F181ADULT18	10/1/2017	6/30/2019	\$	393,981.00
Workforce Solutions	LW06	F18	DSLWK	LW06F181DSLWK18	10/1/2017	6/30/2019	\$	520,550.00

## XIV. Subrecipient Risk Assessment

Subrecipients	Sum of Total Awarded Amount	Risk Assessment Level
Alliance For Business And Training	\$ 10,077,969.99	High
City of Memphis	\$ 26,521,149.64	High
Dyersburg State Community College	\$ 7,073,864.75	High
East Tennessee Human Resource Agency Inc	\$ 10,125,165.44	High
Goodwill Industries - Knoxville, Inc.	\$ 303,913.00	High
Knoxville/Knox Co CAC	\$ 8,396,349.71	High
Meritan Inc	\$ 839,821.00	High
Nashville Career Advancement Ctr	\$ 19,149,915.38	High
North Tennessee Workforce Board	\$ 5,906,587.39	High
Northwest Tennessee Workforce Board	\$ 4,904,336.48	High
South Central Tennessee Workforce Allian	\$ 6,460,245.65	High
Southeast TN Development District	\$ 14,045,744.11	High
Southwest Human Resource Agency	\$ 7,566,303.88	High
Tennessee Community Services Agency	\$ 499,510.00	High
The University of Tennessee	\$ 556,065.00	High
Upper Cumberland Human Resource Agency	\$ 5,606,630.00	High
Walters State Community College	\$ 12,902,344.37	High
Workforce Essentials Inc	\$ 7,978,355.78	High
Workforce Solutions	\$ 5,151,170.53	High
<b>Grand Total</b>	<b>\$ 154,065,442.10</b>	

Per 20 CFR 683.410(b)(2)(i), the State monitoring system must provide for annual on-site monitoring reviews of local areas.

Due to the restructuring that was required in the change from WIA to WIOA, all areas have been assigned a high risk level.

## XV. Explanation of Previous Cycle Monitoring Findings

Previous Cycle Monitoring Findings								
Corrective Action Tracking- Log								
October 1, 2016-September 30, 2017								
Sub-Recipient	Date Report Issued	Results of Monitoring Review Bold (green fill)= No finding	Corrective Action Due Date	Date of Local C.A.P. Response	TDLWD Request for additional document	Response from LWDA	TDLWD Additional Request	Final Acceptance Letter
LWDA 1	1/20/2017	<p>1. Unallowable costs were charged to grants. Travel costs were paid to two consultant vendors.</p> <p>2. One piece of equipment could not be located.</p> <p>3. Case management in the SCSEP Program needs improvement. LWDA 1 failed to document participants refusing physical examination. Individual Employment Plan of participants were not updated to show the current activity status of participants.</p>	2/20/2017	2/17/2017	5/2/2017 and 5/30/2017 additional doc. Requested	5/25/2017 and 6/22/2017 response from LWDA	N/A	7/6/2017
LWDA 2	7/27/2017	<p>1. LWDA 2 may not meet the Youth 20% Work experience requirement, as required by Title I of WIOA</p> <p>2. Question costs were charged to contract LW02P151DSLWK16</p> <p>3. Equipment acquisition cost needs updating in the inventory records</p>	8/27/2017	7/31/2017	e-mail from TDLWD 8/10/2017 and 9/7/2017 for support documents	Response from LWDA 9/7/2017		
	4/8/2016	<p>1. LWDA 2 over reported expenses regarding RSA portion to several WIA contracts and to career centers. The total questioned cost for the over reported expenses were \$137,799.04.</p> <p>2. Insufficient detail to determine food expenses in the amount of \$285.00 related to East Tennessee Marketing Association agenda.</p>	5/8/2016	5/19/2016	e-mail from TDOL on 6-2/2016	Response from LWDA 6/2/2016	e-mail from TDLWD on 6/3/2016	6/13/2016
LWDA 3	10/26/2016	<p>1. Unallowable costs were charged to contracts. a) fleet vehicles services expenses were charged to contract LW03P14YOUTH15 in the amount of \$946.99.</p> <p>b) Graduation Youth Senior Banquet expenses were charged to LW03P141YOUTH15 and LW03P151Youth16 in the amount of \$2,775.62 and \$1,764.45 respectively.</p> <p>c. An unapproved purchase of a computer cover was charged to contract LW03P141Youth15 in the amount of \$109.23. The purchase request sent to the department included the computer cover</p> <p>2. Due to eligible participant being enrolled in and beginning training in September, the training expense was obligated and occurred prior to the contract period.</p> <p>3. Participant's case management needs improvement.</p>	11/26/2016	11/23/2016	N/A	11/28/2016 LWDA sent additional information	N/A	12/9/2016
	12/12/2017	<p>1. Questioned cost were charged to contracts. A. Sales tax of \$22.46 charged to contract LW03F161DSLWK16. B. A sales tax in the amount of \$10.16 charged to contract LW03P16DSLWK17.</p> <p>2. Agency may not meet the required 20% expenditures of total youth funds received for the out of school participants.</p> <p>3. The federal funding in source of purchased equipment needs updating in the inventory records.</p>	1/12/2018					
LWDA 4	1/20/2017	<p>1. A board member was paid for a travel reimbursement claim that was greater than the state's travel reimbursement schedule.</p> <p>2. Unallowable cost was charged to contract. Sales tax associated with office supplies was paid and billed to a contract.</p> <p>3. One piece of equipment could not be located during the on-site monitoring visit</p>	2/20/2017	2/16/2017	N/A	LWDA phone notice to send additional documents	N/A	4/27/2017
LWDA 5	11/30/2016	<p>1. Unallowable costs were charged to contracts: Agency staff attended the 2015 Etowha Chamber Annual Banquet for \$150 and 2016 Annual Banquet for \$150, as a result of these discrepancies, PAR questioned costs the total amount of \$300.00.</p> <p>2 Agency staff traveled in September 2015 to attend the US Conference of Mayors. The travel total \$660.49 and was charged to contract LW05F15NCSWA15, which has a contract period of October 1, 2015, through June 30, 2016.</p> <p>3. YMCA billed LWDA 5 and was overpaid for mileage, because the state's reimbursement rate of \$0.47 per mile.</p>	12/30/2016	12/22/2016	Correspondence from TDLWD 1/10/2017	Correspondence from LWDA 1/24/2017	N/A	1/27/2017
LWDA 6	12/1/2016	no finding						
	11/9/2017	<p>1. Expenses were charged to contract LW06F171RESEA17, even though the expenses occurred prior to the contract period, questioned cost amount of \$237.16</p> <p>2. Procedure over reporting needs improvement. Over expenditures reports on contracts #LW06F171ADULT17 in the amount of \$2,169.13 and \$2,630.35 on contract # LW06F171DSLWK17 and an over expenditure report on contract #LW06P161YOUTH17 in the amount of \$526.12.</p> <p>3. Agency may not meet the 20% expenditures of the total youth grant received on our of school youth.</p> <p>4a. Case management needs improvement, activity of participants were not updated in VOS. 4b. Appropriate follow up was not completed (6) adults and (3) dislocated workers were sampled.</p>	12/9/2017	11/22/2017	12/12/2017			
LWDA 7	2/3/2017	No finding						

	2/17/2016	1. Unallowable costs were charged to a Rapid Response contract. 2. Expenses were charged to a contract prior to the contract period.	3/17/2016	3/3/2016	emails from TDLWD sent on 3/18/2016 4/11/2016 4/22/2016	Correspondence from LWDA 4/11/2017 5/10/2016	N/A	5/14/2017
LWDA8	7/28/2017	no finding						
	6/3/2016	1. Reported expenses were not allocated according to the approved method. 2. procedures for determining current unliquidated obligations for the Monthly Expenditure Report need improvement.	7/3/2016	7/17/2016	e-mail from TDLWD on 7/24/2016	Correspondence from LWDA 7/28/2016	N/A	7/28/2016
LWDA 9	8/9/2016	1. Travel that occurred prior to the contract period was charged to a contract by a reallocation journal entry. Question cost of \$58.77 of travel expenditures.	9/9/2016	9/13/2016	N/A	N/A	N/A	9/15/2016
LWDA 10	1/20/2017	1. Unallowable costs were charged to grants. Travel costs were paid to two 2. A credit was not posted to the correct contract. Observation: LWDA 10 appears to have not prepared draw down requests based on their immediate cash needs for two contracts. PAR will continue to monitor reimbursement draws with upcoming monitoring visits.	2/20/2017	2/16/2017	from TDLWD 3/8/2017 3/22/2017 3/27/2017; 4/13/2017; 6/26/2017	from LWDA 3/22/2017 3/29/2017 4/5/2017 5/31/2017	N/A	7/7/2017
LWDA 11	9/2/2016	1. Expenses were charged to contract even though the expenses incurred prior to the contract period.  2. Unallowable costs were charged to contracts. Questioned cost in the amount of \$779.70 3. The agency did not comply with its cost allocation plan. 4. In-kind match for the SCSEP was over reported. (clerical error). 5. Procedure over reporting need improvement. 6. Procedures for allocating program costs need improvement. 7. Journal entry transactions were not supported with sufficient documentation 8. Career Center expenses were over reported	10/2/2016	9/28/2016	The LWDA was sending support documents after submitting their response on 9/28/2016	Request for Additional Doc from TDLWD on 1/10/2017	The LWDA was sending support documents after submitting their response after 1/10/2017	1/26/2017
LWDA 12	00/00/2017	no finding						
LWDA 12	00/00/2016	no finding						
LWDA 13	3/24/2017	1. On the Job Training (OJT) wages for three participants were charged to contract LW13F151ADULT15 , even though the wages were earned prior to the contract period. 2. Questioned costs were charged to contract LW13P141YOUTH15. Food Costs in the amount of \$58.05 and reimbursement to subrecipients meal in the amount of \$231.15 for a total of \$271.20. 3. Equipment funding source needs updating in the inventory records.	4/24/2017	4/24/2017	e-mail sent to the LWDA on 5/8/2017, 5/17/2017	Response from LWDA on 5/9/2017, 5/17/2017		
Tennessee Community Service Agency	8/18/2016	No finding						
Meritan Inc.	3/16/2017	1. Travel expenses for two (2) staff were charged to SCSEP even though the expenses were incurred prior to the contract period. 2. Questioned cost of \$14.50 staff cos, system error.	4/16/2017	4/10/2017	N/A	N/A	N/A	5/30/2017
	6/24/2016	1(a) Lodging expenses for Senior Service for America were charged to TDLWD's Senior Community Service Program (SCSEP) in the amount of \$142.48  1(b) Mileage and per-diem for the SSAI conference in the amount of \$448.04 was charged to the TDLWD(SCSEP). (c) Funeral flowers for a Meritan's staff family member in the amount of \$59.95 was charged to the SCSEP. (2) Reporting procedures need improvement	6/24/2016	7/12/2016	N/A	N/A	N/A	7/29/2016





Department of  
**Labor & Workforce  
Development**

## **XVI. Monitoring Questionnaires**



## LWDB/AJC System Questionnaire-WIOA Duties and Controls Review for LWDA \_\_\_\_\_

KEY	
<b>*</b>	<b>Information will be provided and reviewed in advance of the visit</b>
<b>**</b>	<b>Information will be reviewed at onsite visit</b>
<b>***</b>	<b>Information will be provided in advance of the visit and reviewed at onsite visit</b>
<b>C</b>	<b>Compliance Team Review</b>
<b>P</b>	<b>PAR Review</b>

### I. Local Governance

- a. Interlocal Agreements are in place and executed **(\*C)** Yes No
  
- b. Partnership Agreements are in place and executed **(\*C)** Yes No
  
- c. Board roster compliant with WIOA composition standards **(\*C)** Yes No
  
- d. What process and mechanisms are in place for Board staff and the fiscal agent to report data, finance, and performance information to the Board? **(\*)**
  
- e. Did the LWDB hire a director and other staff to assist in carrying out the functions of the local Board? **(\*C)** Yes No
  - 1. If yes, is the board a 501c and are employees/staff hired direct? **(\*C)** Yes No
  
  - 2. If yes, has the LWDB established and applied a set of qualifications for the position of director that ensure the individual selected has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in carrying out the functions of the Local Board? **(\*C)** Yes No

- f. Do Local Board staff assist the Local Board in any capacity other than to fulfill the required functions of WIOA Section 107(d)? **(\*\*C & P)** Yes No
- g. Did the LWDB select an entity to staff the Local Board that provides additional workforce functions beyond the functions described in WIOA Section 107(d)? **(\*C)** Yes No
1. If an entity that provides additional workforce functions beyond the functions described at WIOA Section 107(d) is serving as staff to the board, has the board and entity executed an agreement as required and outlined in 20 CFR 679.400(e) that clarifies their roles and responsibilities? **(\*C)** Yes No
  2. Is this agreement separate from the Interlocal and Partnership Agreements? **(\*C)** Yes No
- h. Have the CLEO and Fiscal Agent executed a contract/MOU clearly outlining the Fiscal Agent's roles and responsibilities? **(\*C)** Yes No

## II. Firewall Provisions

- a. Board staff are properly separated from the delivery of services (with the exception of business services, which may be delivered by LWDB or a combination of LWDB and contracted provider. **(\*\*P)** Yes No
- b. Is the OSO clearly the functional manager of the AJC? **(\*\*C&P)** Yes No
1. Describe the roles and functions between Board staff and OSO in regards to daily operations and service delivery.
- c. If the OSO's entity is also the provider of career services, there are clear firewalls and separations of duties in place between OSO function staff and career service staff. **(\*\*C&P)** Yes No

- d. Contracts or MOU are in place that clearly outline the delivery of business services between Board staff and service provider. **(\*C)** Yes No
- e. Explain the process of how partners are coordinated within the AJCs and how staff scheduling takes place. **(\*\*\*C&P)**
- f. Is Board staff physically located in any of the AJC sites? **(\*\*P)** Yes No
- g. What mechanisms and procedures are in place to allow for the OSO to coordinate/schedule the daily activities of career service providers/staff? **(\*\*\*C&P)**
- h. Explain how the LWDB/Board staff are removed from daily management of the OSO and how they have created a firewall from daily management to allow for no conflicts of interest, enabling the LWDB/Board staff to carry out their duties of monitoring the OSO and other related contract. **(\*\*\*C&P)**
- i. Provide an organizational chart for the OSO and career service provider. **(\*C)**
- j. Provide an organizational chart for the fiscal agent and staff to the Board. **(\*C)**

### **III. Career Services**

a. Describe how Adult/Dislocated Worker/ SNAP/RESEA/SCESP services are delivered. **(\*\*\*C)**

b. Describe how the mobile unit is staffed in the local area? Describe the scheduling/planning process for the mobile unit. **(\*C)**

c. Describe the AJC resource room process. **(\*\*\*P)**

- d. Describe the front desk/check in process. **(\*\*\*P)**
- Is the priority of service process for veterans and eligible spouses being observed during checkin? Yes No
  - Is there a process for initial intake being conducted by the intake unit? Yes No
  - Are appropriate referrals to partner staff occurring during intake? Yes No
  - Is the VOS greeter being utilized to count traffic to the center? Yes No
- e. Describe how “Meaningful UI Assistance” is provided in the comprehensive and affiliate sites. **(\*\*\*P)** Meaningful Assistance is defined in 20 CFR 678.430 as:
- Providing assistance by phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time.
  - The Combined State plan for Tennessee states that assistance with a UI claim will be provided utilizing Zendesk and Zoprim chat.
- f. Is there a referral process as outlined in TEGl 16:16 for both internal and external partners? **(\*\*\*C&P)** Section 8 of the MOU-IFA guidance states “Parties to the MOU must provide specifics in the One-Stop Service Delivery MOU detailing how Partners will refer individuals to appropriate services and activities and receive feedback on the outcome of the referral.” An example of a referral process with an external partner would include a form (electronic or paper) that is filled out regarding the



d. Are required fiscal reports submitted timely? **(\*C)** Yes No

## V. Monitoring

a. Are the AJC's adequately staffed? **(\*\*\*P)** Yes No

1. How many staff are OSO? How many are career services?

b. How many are staff to the Board? **(\*\*\*C)**

c. Has the LWDB established a formal monitoring plan and guide? **(\*\*\*C)** Yes No

d. How are AJC hours of operation managed? **(\*\*\*C)**

1. What are the basic hours of the AJC? **(\*C)**

e. Is the OSO monitoring and executing the agreements with partners as outlined in the LWDA's MOU? **(\*\* C&P)** Yes No

1. Please give detailed examples



f. How is the OSO reporting to the LWDB and their staff (Board staff) on operations, performance, and continuous improvement recommendations? **(\*\*\*C)**

g. Is the local Board monitoring the OSO and service provider contracts to ensure deliverables are being executed? **(\*\*\*P)** Yes No

h. What criteria is your LWDB using to evaluate OSO performance? Please provide a copy of the LWDB's written monitoring guide or plan. **(\*\*\*C&P)**

1. Who is tasked with conducting the monitoring? **(\*)**

2. How often is the process conducted? **(\*)**

i. How is the monitoring process being formalized and reported out at the LWDB meetings, to the CLEO, and to TDLWD? **(\*C&P)**



- f. Is there a contract in place and a plan outlined on how the Board staff and service provider will coordinate business services? **(\*C)**

## **VII. Youth Services**

- a. Were youth services allocated through TDLWD under WIOA section 128(b) contracted out to eligible youth service providers? **(\*C)** Yes No
- b. If youthbuild grants were received, what entity is designated as the service provider? **(\*C)** N/A
- c. Provide the name of the entity providing youth services under section 128. **(\*C)**

## **VIII. RESEA**

- a. Are RESEA services provided through contracted service providers? **(\*\*\*C)** Yes No
- b. Provide the name of the entity providing RESEA services **(\*\*\*C)**
- c. Describe the process for referring and co-enrolling RESEA participants into WIOA **(\*\*\*C)**
- d. What percent of RESEA participants were referred to Title I services? **(\*\*\*C)**

- e. What percent of RESEA participants referred to Title I services were co-enrolled?  
**(\*\*\*C)**

**IX. SNAP E&T**

- a. Are SNAP E&T services provided through contracted service providers? **(\*C)**  
Yes No
- b. Provide the name of the entity providing SNAP E&T services. **(\*C)**
- c. Describe the process for referring and co-enrolling SNAP E&T participants into WIOA  
**(\*\*\*C)**
- d. What percent of SNAP E&T participants were referred to Title I services? **(\*\*\*C)**
- e. What percent of SNAP E&T participants referred to Title I services were co-enrolled?  
**(\*\*\*C)**

**X. SCSEP**

- a. Are SCSEP services provided through contracted service providers? **(\*\*\*C)**  
Yes No N/A
- b. Provide the name of the entity providing SCSEP services. **(\*C)**



**WORKFORCE INNOVATION MONITORING TOOL  
ADULT PROGRAM**

**Subrecipient:**

**Date:**

**Completed by:**

**Review Date:**

**TDLWD Monitor:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
<p>Are career services made available by the American Job Center system (AJC) to all of the following, without eligibility requirements and regardless of the area of residency:</p> <ul style="list-style-type: none"> <li>▪ All employers and job seekers?</li> <li>▪ Unemployment Insurance Claimants?</li> <li>▪ Veterans?</li> <li>▪ Migrant and seasonal</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
farm-workers? <ul style="list-style-type: none"> <li>▪ Individuals with disabilities?</li> </ul>					
Does the AJC/Career Center System have sufficient staff, equipment, and oversight to deliver core services and applicable intensive services through: <ul style="list-style-type: none"> <li>• Self Service?</li> <li>• Facilitated self-service, and</li> <li>• Staff assisted service?</li> </ul> (Are the necessary resources available? Back-up resources?)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the Career Center system have a documented procedure in place which ensures that staff receive information about UI claimant's ability or availability of work offered to them?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the Career Center system make career services available by the AJC/ Centers, by contracts with service providers?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the Career Center system have in place policies and procedures which ensure that AJCs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
provide: <ul style="list-style-type: none"> <li>Coordinated resources and supportive services?</li> </ul>					
<ul style="list-style-type: none"> <li>Services to assist adults and dislocated workers?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>Accurate information about the availability of supportive services in the LWDA?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>Referral to programs which provide supportive services?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Does the LWDA system have policies and procedures in place which demonstrate that:</p> <ul style="list-style-type: none"> <li>Follow-up services are included in IEPs?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>Proposed monetary assistance during and throughout follow-up services are included in IEPs?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>Criteria used to provide support services to individuals who are employed and earning self- sufficient wages?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Does the Career Center system have documentation to determine: participants need training services and have the skills and qualifications to successfully complete a training program?</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Does the Career Center System have documentation to define the adult priority of service requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have in place policies and procedures regarding wage and labor standards, and health and safety standards that comply with WIOA regulations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there a criteria developed to target those most in need of training services?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA system have documentation showing the follow-up services for a minimum of 12 months following the first day of employment, to registered participants who are placed in unsubsidized employment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have an employee who verifies data entered into VOS for accuracy?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Have formal or informal training programs been established to provide the knowledge and skills necessary to determine activities and costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
allowed?					
Are there written policies to provide direction for making and documenting eligibility determinations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are eligibility objectives and procedures clearly communicated to employees?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are authorized signatures, (manual or electronic) on eligibility documents periodically reviewed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is access to eligibility records limited to appropriate persons?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are manual criteria checklists or automated processes used in making eligibility determinations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the information used in making eligibility determinations verified for accuracy?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there procedures to ensure the accuracy and completeness of data used to determine eligibility requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are program quality-control procedures performed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are program managers provided with applicable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
requirements and guidelines?					
Are conflict of interest statements maintained for individuals responsible for determining eligibility?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have policies and procedures in place which ensure that a participant in a program shall not displace other employees: <ul style="list-style-type: none"> <li>• Who are on layoff from similar jobs?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Whom the employer has terminated with the intention of filling the position with subsidized and/or employees?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Whose place for promotion is infringed upon?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



**WORKFORCE INNOVATION MONITORING TOOL  
DISLOCATED WORKER PROGRAM**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Has the LWDA developed a policy for relocation assistance and the rationale for the policy?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are authorized signatures (manual or electronic), that are on the eligibility documents, periodically reviewed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is access to eligibility records limited to appropriate persons?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the information used in making eligibility determinations verified for accuracy?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Are channels of communication established for people to report suspected eligibility improprieties?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are program quality control procedures performed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are conflict of interest statements maintained for individuals responsible for determining eligibility?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the OJT contract have assurances attached to the contract?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



**WORKFORCE INNOVATION & OPPORTUNITY ACT MONITORING TOOL  
YOUTH PROGRAM QUESTIONNAIRE**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
How does the Local Workforce Development Area (LWDA) define additional assistance to youth?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Were youth-service providers obtained through a competitive procurement basis?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are youth funds—amounting to 75%—being used to serve the out-of-school population?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are all the fourteen required elements of the Youth Program being made available in the LWDA and listed in the Youth section of this manual?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Is the Youth Council or the Standing Committee meeting regularly?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there a quorum when contracts are approved and Request for Proposals (RFPs) issued?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA use the statewide waiver for older youth enrolled in the previous WIA program to receive Individual Training Accounts (ITAs)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA system provide youth referrals for supportive services?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA system provide objective assessments for youth participants and work experiences for youth such as:  Instruction in employability skills?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Exposure to the aspects of industry such as team work, internship, paid and unpaid community service, or job shadowing?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA system provide objective assessments (for youth participants) which cover academic levels, skill levels, and service needs of each	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
participant and which will also include a review of: <ul style="list-style-type: none"> <li>• Basic skills?</li> <li>• Occupational skills?</li> <li>• Prior Work Experience?</li> <li>• Employability?</li> <li>• Interest?</li> <li>• Aptitudes?</li> <li>• Supportive service needs?</li> <li>• Developmental needs?</li> </ul>					
Does the LWDA system include Youth Program components which are included in the WIOA program included in this manual in the Youth section?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there written policies to provide direction for making and documenting eligibility determinations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there procedures to calculate eligibility amounts that are consistent with program requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are eligibility objectives and procedures clearly communicated to employees?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Are authorized signatures (manual or electronic) on eligibility documents periodically reviewed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is access to eligibility records limited to appropriate persons?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA provide work experience for youth?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the LWDA paying wages and benefits for youth in work experience?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have a year-round program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are youth provided follow-up services for 12 months after program exit?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have a separate Summer Youth Program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA prohibit discrimination based on race, sex, or age in its employment practices?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are youth given the opportunity to register for apprenticeship programs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Have all grant requirements been verified?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		





**WORKFORCE INNOVATION & OPPORTUNITY ACT MONITORING TOOL  
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP) QUESTIONNAIRE**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Comments</b>	<b>(For TDLWD Monitor Use Only)</b>
					<b>Verified and Comments</b>
Is the subrecipient familiar with the WIOA requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does a Memorandum of Understanding (MOU) exist between the subrecipient and the WIOA Local Workforce Development Board (LWDB)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are applicable SCSEP core services at the comprehensive Career Center outlined in the	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
MOU?					
Is there a referral process identified and described in the MOU?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Did the subrecipient choose to arrange a reciprocal arrangement in the MOU?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the subrecipient distribute Career Center handouts to customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do the recruitment and selection procedures reflect the subrecipient is seeking to enroll minorities?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do the recruitment and selection procedures reflect the subrecipient is seeking to enroll Limited English speaking eligible individuals?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Do the recruitment and selection procedures reflect the subrecipient is seeking to enroll those with the greatest economic need?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are host agency Agreement files being maintained in accordance with SCSEP regulations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there feasible evidence that the subrecipient is adhering to the priorities and preferences when examining participant characteristics?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have a waiting list?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there a policy/procedure for immediate or 30-day terminations due to incorrect determination of eligibility?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Is there a written grievance policy for complaint resolution for employees, subrecipient, and participants?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the Confidential Income Statement used for both application and recertification?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is orientation provided to new participants at the time of enrollment or prior to the first day at a host agency and compensated?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there documentation that the host agencies and supervisors have been provided orientation?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project assess each new participant to determine the most suitable SCSEP assignment for that individual?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Is the assessment made in consultation with the participant and does it consider the individual's preference of occupational category, work history, skills, aptitudes, and potential for performing proposed community service duties?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the assessment consider the potential for transition to unsubsidized employment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project evaluate each participant to determine potential for transition to unsubsidized employment and the appropriateness of participant's current community service employment assignment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project develop alternate assignments, whenever feasible, if it is	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
determined that a different community service employment assignment will provide greater opportunity for the use of the participant's skills and aptitudes, providing work experience which will enhance the potential for unsubsidized employment?					
Is the Individual Employment Plan (IEP) developed prior to the participant being assigned to a CSA and does it include the assessment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project evaluate the progress of the participant at least once a year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are participants receiving daily supervision at training sites?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are supervisors ensuring that no participant works	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
more than the compensated number of hours per day?					
Are participants compensated for extra hours?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are supportive services being provided to assist participants in subsidized and, where appropriate, in unsubsidized employment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are supportive services obtained at no cost or reduced cost to the program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are grant funds used to subsidize participants transportation cost?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is transportation obtained at no cost or reduced cost to the program.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Is training being provided in job seeking skills in preparation for unsubsidized placement?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are host agency community service activities provided, and clearly spelled out in the participant job description and IDP to avoid not confusion with training?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are training records kept in accordance with TDLWD/SCSEP policy?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Have all training/education costs expended during the current year been described in a detailed subrecipient work-plan/budget or been approved in writing by the TDLWD coordinator?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are participant meetings held quarterly and are	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
they documented?					
Are there documented copies of the agenda and sign-in sheets for quarterly participant meetings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are customer satisfactions surveys on file for participants that have completed 30 days of subsidized employment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Was the unsubsidized placement goal met last year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are private and public sector employers contacted directly to identify and develop suitable job openings for SCSEP participants? Are these efforts being documented?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do follow-ups conform to US Department of Labor requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Are initial physical examinations offered to each participant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are additional physical examinations offered at least once a year or before fifteen continuous months?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are physical examinations obtained at no cost to the project whenever possible?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the maximum duration of enrollment been established and approved in the grant agreement?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has a limit on the amount of time at each agency been established and approved in the grant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the sub-grantee have a termination policy on file?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
During orientation and throughout participation, are participants informed and reminded of the non-employment status of community service activities?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the project over-enrolled?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the project monitoring spending levels during the grant year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there a procedure in place that governs implementation of the provision against activities utilizing SCSEP funds?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there documentation that SCSEP staff and participants are informed that they are prohibited from participating in political activities while on the	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
job?					
Are project funds used in any way to support union activity?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are any participants paying union dues?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the project ensuring, for it and its host agencies, compliance with nepotism requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are grievance procedures followed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Have any complaints been filed this grant year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are complaints documented and filed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
When a project decides to take adverse action against a participant, does the Project Director notify the	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
TDLWD coordinator prior to taking any action?					
Was adverse action initiated against any participants during the previous program year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Have there been any reports or accusations of suspected discrimination brought to the attention of project staff?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Have all project staff been trained to ensure compliance with Americans with Disabilities Act (ADA)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project ensure that nondiscrimination assurances are included in all contractual agreements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there documentation reflecting that host	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
agencies are aware of the Maintenance of Effort (MOE) requirements?					
Are participants' working assignments a substitute for non-Title V work that should be performed by the regular employees of the host agency?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there any MOE violations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are the expenditures charged to Title V reasonable (based on allocation formula)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the accounting system have cost codes to separate Title V from other programs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have a system for allocating cost to the appropriate cost category?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Does the project have a system for monitoring planned vs. actual costs and for taking corrective action?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the project earned any program income?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the Project Office accounting system provide adequate cost data to the Project Director?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Did the project comply with all closeout procedures required by the Legal Agreement?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do all financial reports include accruals?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the sub-sponsor charge indirect cost to the grant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the sub-sponsor use an approved indirect cost rate for charging	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
indirect cost to the grant?					
Does the rate agreement cover the period of performance for the current grant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
What is the rate?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Were there any administrative findings in the last audit report?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the project taken corrective action to resolve the findings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has a final Findings & Determination (F&D) been made?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Were any costs disallowed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is staffing in accordance with approved contract agreement and budget?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Are job descriptions available?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project maintain on-site Organizational Charts?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project maintain on-site Position Descriptions?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project maintain on-site time sheets?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there posting of appropriate posters (e.g. political activity limitation, EEO) in the project office?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there documentation that the project is continuing to seek out new host agencies?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the project provided orientation and training to host agencies?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Is the project following plan of action as outlined in the Grant Narrative?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the staff implemented recommendations for any corrective action?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are members of the staff familiar and knowledgeable of the grant's Plan of Action?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are the monthly and quarterly financial and programmatic reports submitted to the TDLWD accurately and in a timely manner?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there consecutive time sheets properly signed for each preceding pay period?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there evidence that a wage of at least the current Federal or State minimum wage— whichever is higher—is	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
being paid participants?					
Are cumulative work hours tracked?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
If applicable, are annual and/or sick leave time accrued accurately and are records kept?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the physical, reexamination, and/or waiver kept separately according to ADA requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Was there a Participant Training Description at the host agency?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the project established written policies relating to compensation for scheduled work hours during which an applicant's or subrecipient's business is closed for Federal holidays?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Do you have the orientation documentation on the host agency?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do you have the orientation documentation on the grievance procedure?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are the Participant Performance Evaluations on file?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are the host agency and Participant documents on file?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there a monitoring form on file?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are host agency File Verifications included?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the host agency agreement include the FEIN?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have adequate Public	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Liability and other appropriate forms of insurance as stated in the Grant Agreement?					
Does the project have Workers' Compensation Insurance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have Occupational Diseases Insurance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have Employer Liability Insurance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have General Liability Insurance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have Automobile Liability Insurance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are there written travel procedures?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do the travel expenses charged to the subrecipient meet the	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
requirements of the grant?					
Does the project have a copy of the latest Equitable Distribution Plan?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the project have a copy of the latest State Plan?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the subrecipient using the IEP in determining when it is appropriate to rotate participants through assignments, with the goal of achieving unsubsidized employment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there a written policy setting forth actions to be taken to deal with those found to be ineligible, including notification of their right to appeal the finding?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Has the project established written policies relating to necessary sick leave that is not part of an accumulated sick leave program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is there an IEP Termination policy on file?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the IEP Termination policy been approved by US Department of Labor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are participant files being maintained for 5 years after the program year in which all follow-up activity for a participant has been completed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are participant records securely stored an access limited to appropriate staff to safeguard personal identifying information?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Has the SCSEP Quarterly Progress Data report been submitted by the 30th of the month after each quarter?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the project provided the administrative office with an MOU specifying how services will SCSEP services are provided by SCSEP partners?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are medical records and criminal background checks being kept separate from participant files?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are quarterly Progress and Narrative Reports being sent no later than the 10 <sup>th</sup> after each quarter to TDLWD?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are SCSEP participants being assessed for computer literacy training?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only)  Verified and Comments
Is the Participant Services flow chart on file?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the Participant Services flow chart being used in the delivery of SCSEP Services?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



**Subrecipient:** \_\_\_\_\_

**Reviewer:** \_\_\_\_\_

**Date of Review:** \_\_\_\_\_

**Executive Director Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Fiscal Director Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**WORKFORCE INVESTMENT & OPPORTUNITY ACT MONITORING TOOL  
FISCAL QUESTIONNAIRE**

QUESTION	YES	NO	N/A	PARAMETERS
Have all of the LWDA's programs exceeding \$750,000 in WIOA funding been audited during the past two years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to the audit report and the corrective action if any are on file with the administrative office.
If so, have all audit reports been sent to grantor agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please cross-reference the LWDA administrative office and grantor agency for verification.
Does the LWDA annually authorize all bank accounts and check signatories?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify with current bank documentation of authorization and check signatories at LWDA and compare to TDLWD fiscal office.
Does the LWDA have a line item budget for the Adult, Dislocated Worker, and Youth Program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the budget for each program.
Does the agency have a method to ensure that the obligation on all contracts does not exceed availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure or any method the LWDA uses to prevent over-obligation of contracts.
Were the expenditures on contracts (WIOA contracts) over reported?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check all invoices and reconciled reports submitted to TDOL during the monitoring period.
How often does the LWDA draw down cash and how does it determine the amount to be drawn?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the cash management activities and the needs for the amounts to be drawn.
Does the LWDA have a policy on cash management and does it follow any such policies on cash management?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if its policy is followed as instructed.

All LWDA procurements of sensitive equipment or procurements having a unit cost of \$5,000 or more must have prior written approval from TDLWD.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see the approval and the request submitted to TDLWD.
Does the LWDA account for any program income earned? Were all program incomes reported if any?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please learn whether or not the LWDA has earned program income and reported it to TDLWD during the proper reporting quarter.
Did the LWDA use its earned program income for program service(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check what the program income was used for.
How does the LWDA allocate funds to staff working in various grants? How is time of staff allocated and documented for these various programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with the fiscal administrator to review staff time distribution sheets and the calculations based on the documented time distribution.
Is the LWDA adhering to TDLWD travel regulations when its employees are on business travel? Are mileage logs documented and payments based business trips only?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the LWDA's travel policy and how it is followed and how payments made.
Are the agency's vehicles used by personnel for personal business?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if payments are made for personal use and if the LWDA authorized these vehicles to be used as personal vehicles for the staff.
Is new equipment tagged and inventory taken before the quarter preceding the monitoring visit? If equipment is missing, did the LWDA report to authorities and inform TDLWD?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the inventory list and see if it is updated to account for all new acquisitions. Please check to see the document submitted to local authorities and to TDLWD for missing equipment.
Did the cognizant agency provide an approval letter for indirect cost rate for the WIOA program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please request letter of approval from administrative staff.
Are time sheets maintained for any employees who work on more than one program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review time sheets of employees assigned to more than one program, for Labor Distribution.
Are the LWDA's depreciation policies or methods of computing use allowances in accordance with the standards outlined in federal circulars or WIOA regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review LWDA depreciation policies.
Does the LWDA system have procedures that provide reasonable assurances that consistent treatment is applied in the distribution of charges as direct or indirect costs to all benefiting programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review procedures regarding distribution of direct/indirect charges.
Are all expenditure and obligations made within the contract period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please examine the general ledger and other support documentations to ensure all expenditures are within the contract period.

Does the LWDA have a record of the cost allocation plan approved by the cognizant agency and did the LWDA apply these costs accurately and consistently?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the plan and paper work to see how the approved indirect cost is applied.
Are administrative costs applied according to the plan for the particular contract number or program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review administrative costs and how they are applied to each contract and determine if the costs are within the limits allowed.
Are all purchases above the threshold amount competitively bid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review purchase orders and verify the existence of several suppliers.
Has the LWDA sent a request to TDLWD for acquisition of equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please ask for a copy of the request form.
Have the subrecipients required their subcontracts to include language stating that they will use Jobs4TN as the primary portal for job seekers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review subcontract agreements and ensure that the agreement contains compliance information and monitoring schedule.
Does management provide personnel approving and pre-auditing expenditures with a list of allowable and unallowable expenditures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review allowable and unallowable list management provided to personnel.
Is there separate accountability for charges and costs between federal and nonfederal activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the accountability for cost and charges to federal and nonfederal activities.
Are adjustments to unallowable costs made where appropriate and follow-up action taken to determine the cause?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if there are unallowable costs and if they have been corrected, and also followed up to avoid future occurrences.
Have internal and external communication channels concerning activities and allowed costs been established?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to each contract agreement regarding activities and allowed costs.
Have formal or informal training programs been established to provide the knowledge and skills necessary to determine activities and allowed costs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to training manuals, developed or training held, for new subcontractors at the local level.
Is there interaction between management and staff regarding questionable costs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to communications between management and staff regarding questionable costs, if any.
Are grant agreements (including referenced program laws, regulations, handbooks, etc.) and cost principle circulars available to staff responsible for determining activities allowed and allowable costs under federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see if the fiscal staff at the LWDA has the WIA/WIOA Financial Supplementary Handbook or the One Stop Guide for reference and the WIA/WIOA law and regulations.

Does management review supporting documentation of allowable cost information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Consult with management team or responsible party for reviewing allowable costs.
Are comparisons with the budget and expectations of allowable costs made?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure used to compare budget and allowable costs.
Are analytical reviews and audits performed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review audit report.
Is the accounting system capable of scheduling payments for accounts payable and requests for funds from treasury to avoid time lapse between drawdowns and actual disbursements of funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure used to avoid time lapse between drawdowns and actual disbursement of funds.
Is there variance reporting of expected versus actual cash disbursements of federal awards and drawdowns of federal funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if there are variances between cash disbursement and drawdown of federal funds.
Are there periodic independent evaluations (e.g., by internal audit, top management) of entity cash management, budget and actual results, repayment of excess interest earnings, and federal drawdown activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check if evaluation has been made regarding cash management, budget and actual results, repayment of excess interest earnings, and federal drawdown activities.
Are contractor and subcontractor payrolls monitored to ensure certified payrolls are submitted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the agreements and contract terms between contractor and subcontractor.
Are management reviews performed to ensure that contractors and subcontractors are properly notified of the Davis-Bacon Act (for incumbent worker or for on-the-job training) services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the Davis-Bacon Act requirements.
Are periodic audits of detailed transactions conducted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the audit report.
Are accurate records maintained on all acquisitions and dispositions of property acquired with federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see if records kept on all acquired property are up-to-date and that a copy has been sent to TDLWD.
Are property tags placed on equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please to see if all property acquired with federal funds is tagged.
Is a physical inventory of equipment periodically taken and compared to property records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see if the inventory listing of all equipment is up-to-date.
Have procedures been established to ensure that the federal awarding agency is appropriately reimbursed for dispositions of property acquired with federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procedure developed to ensure appropriate reimbursement for acquired property.

Are policies and procedures in place for responsibilities of record keeping and authorities for disposition?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the policy for record keeping or interview fiscal management staff responsible for this duty.
Does the accounting system prevent obligations or expenditures of federal funds outside of the period of availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the fiscal management staff about how they prevent expenditures from occurring outside the contract period.
Are channels of communication established for people to report suspected improprieties in the use or disposition of equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the management about how suspected improprieties in the use or disposition of equipment are prevented.
Does management review the results of periodic inventories and follow-up on inventory discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the listing of inventory that the management reviewed before forwarding a list to TDLWD.
Does management review property dispositions to ensure appropriate valuation and reimbursement to the federal awarding agency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review management's property valuation and reimbursement.
Does the budgetary process consider the period of availability of federal funds as to both obligation and disbursement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the quarterly financial expenditure reports forwarded to the awarding agency.
Are the entity's operations such that it is unlikely there will be federal funds remaining at the end of the period of availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review how fiscal management assures that federal funds received are expended before the contract is closed.
Are un-liquidated commitments canceled at the end of the period of availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the directives of management to staff regarding un-liquidated commitments.
Are un-liquidated balances periodically reported to the appropriate level of management, with follow-up?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if management has any decisions or directives for fiscal staff on un-liquidated balances.
Are periodic reviews of expenditures before and after cut-off dates performed to ensure compliance with period of availability requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review expenditure goals to ensure that funds have been expended before the ending dates of funding availability.
Does management perform periodic reviews of reports showing budget and actual expenditures for a specified period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review expenditure reports provided to management for decision making.

Is there a clear assignment of authority for issuing purchasing orders and contracting for goods and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review duties of the fiscal staff.
Does the procurement manual incorporate federal requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procurement manuals of the subcontractor.
Have procedures been established to identify risks arising from conflicts of interest (e.g., kickbacks, related-party transactions, bribery)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the conflict of interest policy of the subrecipient and please check if staff are aware of this policy.
Are conflict of interest statements maintained for individuals responsible for procurement of goods and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with staff responsible for this duty.
Is there an official written policy for suspension and debarment that:  a. Contains or references the federal requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
b. Prohibits the award of a sub-award, covered contract, or any other covered agreement for program administration, goods, services, or any other program purpose with any suspended and debarred party?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the disbarment and suspension policy. If one is not available, please check to see if any written document is provided to staff regarding this provision.
Is the contractor's performance—concerning the terms, conditions, and specifications of the contract—monitored and documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if all contract terms and agreements are honored by the contractor.
Are duties properly segregated between employees responsible for contracting and accounts payable and cash disbursing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the duties of employees in accounts payable and cash disbursement.
Do supervisors review procurement and contracting decisions for compliance with federal procurement policies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procurement procedures, or policy, or manual the contract uses.
Are procedures established to verify that vendors providing goods and services under the award have not been suspended or debarred from federal procurement contracts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procedure the contract uses to verify vendor's status.
Are procurement actions appropriately documented in the procurement form TDLWD established?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check file and the documents to assure activities regarding procurements are documented.

Has a system been established to assure that procurement documentation is retained for the time period required by the A-102 Common Rule, 2 CFR 215 (OMB Circular A-110), award agreements, contracts, and program regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the procurement procedures and verify if the rules for procuring goods and services are followed.
Does management periodically conduct independent reviews of procurements and contracting activities to determine whether policies and procedures are being followed as intended?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview management and find out if there are documents showing independent reviews of the financial system to ensure policies are followed.
Are mechanisms in place to ensure that program income is properly recorded as earned and deposited in the bank as collected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the quarterly financial reports submitted to the grantor.
Does management compare program income with the budget and investigate significant differences?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the involvement of management in this process.
Does management perform an internal audit of program income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview the involvement of management in this process.
Is there a tracking system which reminds staff when reports are due?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if there is a tracking system alerting staff of due reports.
Is the general ledger or other reliable records the basis for reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the documents used for reporting.
Do supervisors review reports to assure the accuracy and completeness of data and information included in the reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if reports were provided to management or supervisors for their review.
Is the required accounting method used to prepare the reports (e.g., cash or accrual)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the accounting method.
Is there an established accounting or information system that provides for reliable processing of financial and performance information for federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the financial system's capability to process financial information for reporting purposes.
Do communications from contractors corroborate information included in the reports for federal awards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review contract terms.
Is there a periodic comparison of reports with supporting records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if financial reports have supporting documents.
Do subrecipients demonstrate that: a. They are willing and able to comply with the requirements of the award?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if the subrecipient is complying with the requirements of the contracts awarded.



b. They have accounting systems, including the use of applicable cost principles, and internal control systems adequate to administer the award?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
Do official written policies exist establishing:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the local policy established that covers the areas mentioned in questions 82 A, B, C, and D.
a. Communication of federal award requirements to subrecipients?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Responsibilities for monitoring subrecipients?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
c. Processes and procedures for monitoring?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
d. A methodology for resolving subrecipient findings of subrecipient noncompliance or weaknesses in internal control?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
e. Requirements for and processing of subrecipient audits, including appropriate adjustment of pass-through entity's accounts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
Is the subrecipients' compliance with audit requirements monitored by using techniques such as:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
a. Determining by inquiry and discussion whether the subrecipient met the threshold requiring an audit under OMB Circular A 133?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. If an audit is required, assuring that the subrecipient submits the report package or the documents required by the latest OMB circulars and/or the recipient's requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
c. If a subrecipient was required to obtain an audit in accordance with OMB Circular A 133 but did not do so, following-up with the subrecipient and taking appropriate actions (withholding further funding) until the audit requirements are met?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
Has management identified for subrecipients the federal award information (e.g., CFDA title and number, award name, name of federal agency, amount of award) and applicable compliance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review if the CFDA, title, number award amounts, etc., mentioned in question 111, are identified for contracts awarded.

Has management included in the agreements with subrecipients the requirement to comply with the requirements applicable to the federal program including the audit requirements of OMB Circular A-133?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review if management has provided and circulated the OMB Circular A-133 to staff to make them aware of A-133 Administrative Requirement.
Is subrecipient's compliance with federal program requirements monitored using such techniques as the following: a. Issuing timely management decisions for audit and monitoring findings to inform the subrecipient whether the corrective action planned is acceptable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the monitoring techniques used by the subrecipient and check which of items the procedure fulfills.
b. Maintaining a system to track and follow-up on reported deficiencies related to program funded by the recipient and ensuring that timely corrective action is taken.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
c. Maintaining regular contacts with subrecipients and making appropriate inquiries concerning the federal program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
d. Reviewing subrecipient reports and following-up on areas of concern.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
e. Monitoring subrecipient budgets.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
f. Performing site visits to subrecipients to review financial and programmatic records and observe operations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
g. Offering subrecipients technical assistance when needed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above.
Is subrecipient's compliance with federal program requirements monitored using such techniques as the following: a. Issuing timely management decisions for audit and monitoring findings to inform the subrecipient whether the corrective action planned is acceptable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the monitoring techniques used by the subrecipient and check which of items the procedure fulfills

<p>b. The description and program number for each program as stated in the Catalog of Federal Domestic Assistance (CFDA)?</p> <p>Note: If the program funds include pass through funds from another recipient, the pass-through program should be identified.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
<p>c. A statement signed by an official of the subrecipient stating that the subrecipient was informed of, understands, and agrees to comply with applicable compliance requirements?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
<p>Is a record keeping system in place to assure that documentation is retained for the time period required by the recipient?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the record keeping system of the recipient of federal funds.
<p>Are procedures in place to provide channels for subrecipients to communicate concerns to the pass-through entity?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure used to communicate concerns to subrecipients.
<p>Has a tracking system been established to assure timely submission of required reporting such as: financial reports, performance reports, audit reports, on-site monitoring reviews of subrecipients, and timely resolution of audit findings?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check with management or staff for a tracking system.
<p>Are supervisory reviews performed to determine the adequacy of subrecipient monitoring?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview management or check written reviews by management about the financial monitoring at the subcontractors level.
<p>Is a current, fully executed, Local Workforce Development Area (LWDA) contract, along with all amendments, at the LWDA administrative office?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if contracts are kept at the administrative office.
<p>Does the LWDA have a documented system of contract administration which ensures that subcontractors perform within the terms of their subcontracts?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the contract terms and agreements made to subcontractors.
<p>Are there mechanisms to ensure that no more than 5% of the youth funds serve non-disadvantaged youth?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the expenditures for the youth program.
<p>Does the payroll for summer youth participants exceed payment amount?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review contract document.
<p>Were expenditures charged to contract prior to the contract's beginning date?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review beginning and end date to determine charges.

Were there discrepancies in the participant's payroll enrolled in OJT/Incumbent Worker and National Dislocated Worker Grants (DWGs) /National Emergency Grant (NEG) programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review terms of contract.
Has the LWDA developed a policy for employee travel expense payment? If not, is the LWDA following the State travel reimbursement policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check what policy the LWDA or their employees are following.
Does the rate of reimbursement for travel exceed the allowed state amount?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the policy or payments made for travel expenses.
Is there a method used by the LWDA to maintain personnel costs for employees working in several programs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check time the distribution sheet employees submit to the LWDA.
Does the financial record the LWDA submitted to TDLWD agree with the accounting records of the LWDA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please compare the accounting records of the LWDA to the records submitted to TDLWD.
Are employees or administrators using WIOA owned vehicles for normal commute from home to work?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the policy to find out if use of vehicles, from home to work, is part of a compensation plan.
Does the LWDA have personal mobile phone policy when a staff member is approved to use personal phones for business?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please read either the state policy or LWDA policy about how personal phones are used for business related calls.
How are payments for business calls calculated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do staff or administrators use logs to distinguish personal & business call payments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check method of payment when personal mobiles are approved for making business calls.
Was there excess cash on hand when examining drawdown amounts at the time of monitoring visit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check drawdown amount expenses to determine excess cash on hand.

## **SNAP Interview Questionnaire for Contractor/Alternate State agency**

*Note to reviewer: Some of these questions are for mandatory programs only, some for voluntary programs and some are for both mandatory and voluntary. Mandatory is indicated with an “M”, voluntary with a “V”. The SNAP E&T program in Tennessee is a Voluntary program. Those questions that deal with Mandatory participation **only** are not required.*

**Person Interviewed:**

**Title:**

**Organization:**

**Phone:**

**Date of Interview:**

**Reviewer:**

### **General**

1. I will ask some specific questions on different aspects of E&T, but first can you please explain in general terms what are your overall responsibilities in the E&T Program. Are these responsibilities spelled out in your contract with the State? M, V
2. How does the process work once the State has referred clients? M, V
3. Who do you work with in the State agency? Which members of your staff deal with the State agency? M, V
4. Has the State agency provided training to your staff on E&T? What areas? M, V

**Review Area - Work Requirements**

1. The State agency is responsible for advising clients of overall work requirements and making a determination if the household is exempt from work requirements. When and how does the State advise you that a particular client is mandatory for E&T? M
  
2. When and how does the state advise you that a particular client is a voluntary participant? M, V
  
3. If a mandatory client becomes exempt after referral to your program, who makes that decision? How does the process work? M
  
4. How do you keep track of participation by mandatory clients? Who is responsible? M
  
5. Do you use the same process to track voluntary clients? V (*Note: If not a mandatory and voluntary program, ask, "How do you track client participation?"*)

### **Review Area - Fair Hearings**

1. Do you have instances where a client requests a fair hearing due to work requirements imposed? M
  
2. What do you do if a client requests a fair hearing? What is your interaction with the State agency? M

### **Review Area - Allowable E&T Components**

1. Does your agency coordinate with the Workforce Development System? If so, in what manner? M, V
  
2. How do you orient clients to the E&T program? Or, is this handled by the State agency? M, V
  
3. Which components are you responsible for providing? M, V
  
4. Who determines which components a client will enter? M, V
  
5. How does the process work for voluntary participants? Do they choose the component in which to participate? V

**Review Area - Sanctions**

1. Are you responsible for identifying non-compliance by a client? M
  
2. Once non-compliance is identified, what happens next? When do you advise the state? M
  
3. What do you do if a voluntary participant stops participating? V
  
4. Who monitors that the sanction process works timely? (*Note to reviewer: this may need to be addressed at both the contractor and State agency.*) M

5. Who makes the decision on whether there is good cause for non-compliance? M
  
6. (If applicable), are you involved in the conciliation process? How does it work? Who is responsible for working with client on conciliation? Who monitors the process? M

**Review Area - Work Hours**

1. Who is responsible for tracking the number of hours a client participates in a component? Is the process automated? M, V
  
2. How many hours do you require for work programs? How many hours do you require for non-work programs, such as job search? M
  
3. How many hours are required for volunteers? V
  
4. What is the control to insure that clients do not exceed the number of hours allowed by regulation? M, V
  
5. Has the state provided training in this area? Who in the state do you work with? M, V

**Review Area - Reimbursements**

1. Do you provide reimbursements to E&T participants? Please describe the process. M, V



2. Who makes the actual decision on which reimbursements are provided to E&T participants?  
M, V

3. What oversight do you have to insure reimbursements are properly provided and allowable?  
M, V

4. Does the state monitor your procedures and the types of reimbursements you provide? M, V

**Review Area - Compliance with Pledge (if applicable)**

1. You are working with a State that has pledged to serve all at-risk ABAWDs. Please explain your involvement in this process.

2. Does the State indicate when a client is an at-risk ABAWD?

3. What activities do you place ABAWDs in?

4. If offered a spot in a component and the client fails to participate, what happens?

5. If a client starts a component, who tracks for continued participation? How is this tracked?  
Is there a tracking tool?

*(Note to reviewer: ask for a copy of the tracking tool.)*

6. If the client stops participating, what happens?

**Review Area - Monitoring of Local Operations and Contractors**

1. Does the State agency review your operation? Who in the State does this? How often are reviews conducted?
2. Does the State agency advise you formally of any problems/issues? What is the process?
3. Please describe the process when the State agency finds problems (the corrective action process.)
4. Does someone from the State agency follow up to determine if your agency has taken proper corrective action?



**WORKFORCE INNOVATION & OPPORTUNITY ACT MONITORING TOOL  
INCUMBENT WORKER PROGRAM QUESTIONNAIRE**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Does local contract contain a "Lobbying" clause?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does local contract have a "Nondiscrimination" clause?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does local contract have a "Public Accountability" clause?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does local contract have a "Public Notice" clause?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does local contract have a "Records" clause?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the number of full time employees to be trained been met?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the company met all proposed fiscal obligations?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Were approved budget items reimbursed upon presentation of adequate documentation?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Was all training completed prior to June 30 of the current program year?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Has the Local Workforce Development Area (LWDA) received approval from the Local Workforce Development Board to use up to 20% of the Adult or Dislocated Worker funds for Incumbent Worker Training (IWT) &amp; has it advised the Tennessee Department of Labor &amp; Workforce Development (TDLWD) of such approval? (Local formula funding only)</p> <p><b>This only applies to formula funds since 100% the Consolidated Business Grant (CBG) can be spent on IWT.</b></p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Has the LWDA received final approval from the TDLWD?</p> <p><b>This requirement only applies to CBG</b></p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
<b>expenditures over \$25,000. Formula funds do not need approval.</b>					
Has the LWDA used the current IWT application provided by the TDLWD? ( <u>Local formula funding only</u> )	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the company provided documentation of the 50% match?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the LWDA completed the Incumbent Worker Application Review?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



**WORKFORCE INNOVATION & OPPORTUNITY ACT MONITORING TOOL  
NATIONAL EMERGENCY GRANT (NEG)/TRADE ADJUSTMENT ASSISTANCE (TAA)  
PROGRAM QUESTIONNAIRE**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Is the Local Workforce Development Area (LWDA) making progress integrating services provided by TAA/NAFTA?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
What is the procedure at the local level to respond to plant closures and mass layoffs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Is the local rapid response coordinator submitting information, about area rapid response activities, to the Employment and Training Unit of the Tennessee Department of Labor and Workforce Development?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are needs surveys distributed and collected	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
before mass meetings?					
<p>Does the local rapid response system include, in its response, these activities:</p> <ul style="list-style-type: none"> <li>• Immediate and on-site contact with the employer, workers, and the local community?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Provision of information and access to it?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Unemployment compensation benefits, One-Stop system services, and employment and training activities?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Guidance or financial assistance setting up a labor Management Committee?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Provision of assistance to the Local Workforce Development Board to develop a coordinated response?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the contractor have policies and procedures in place to ensure that individuals, who apply for	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
National Emergency Grant services, meet the following eligibility guidelines?  • The Dislocated Worker					
• The civilian employee of the Department of Defense	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• The long-term unemployed as a result of disaster	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• The non-managerial employee with the Department of Defense	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• The armed-forces member at risk of termination due to reduction in defense expenditures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• An individual who is not entitled to retire or to retain pay (incident to a separation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• An individual who has applied for employment and training assistance before the end of the 180 day period?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Are these targeted populations reached:  a. The underemployed,	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
<p>because of its lack of certification?</p> <p>and</p> <p>b. The unemployed, but expect to become employed, as a result of their participation in the program?</p>					
<p>Does the LWDA system have documentation in place which demonstrates the integration of services funded under TAA/NAFTA with the services funded under WIOA Title I/ Wagner-Peyser. These services are:</p> <ul style="list-style-type: none"> <li>• Eligibility determinations</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Re-employment plans</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Job-search-allowance applications</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Relocation-allowance applications</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Case Management</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Were equipment-purchasing procedures followed?</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



**WORKFORCE INNOVATION & OPPORTUNITY ACT MONITORING TOOL  
EEO PROGRAM QUESTIONNAIRE**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Has the Local Workforce Development Area (LWDA) appointed its equal opportunity officer for WIOA Title I services?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the LWDA provided reasonable accommodations for persons with disability? If not, see below.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA provide initial and continuing notice (using the required nondiscrimination language) that it does not discriminate on any prohibited grounds?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
<p>Does the LWDA publish or broadcast program information in the news media? If so, does the LWDA indicate in the publications and broadcasts that:</p> <ul style="list-style-type: none"> <li>The WIOA funded program or activity in question is an equal opportunity employer/ program?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>Auxiliary aids and services are available upon request to individuals with disabilities?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Has the LWDA applied analysis to its programs in order to determine how best to deliver language assistance to individuals who are Limited English Proficient (LEP)?</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>If the analysis indicates the need for language assistance services, does the LWDA have in place one or more of the</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
following oral interpretation services:					
• Bi-lingual staff?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Staff interpreters?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Contract interpreters? Or...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Telephone interpreter line?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do the LWDA's written translation procedures fall within the "Safe Harbor" provisions?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Does the LWDA have policies and procedures in place which ensure that interpreters and/or interpreter services provide interpretations as follows:</p> <ul style="list-style-type: none"> <li>• With demonstrated proficiency and ability to interpret in both English and the other language, and the ability to identify consecutive, summary, simultaneous, or sight interpretations?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
<ul style="list-style-type: none"> <li>With knowledge of specialized terms and concepts of the program, vocabularies and phrases used by the LEP person?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Does the LWDA have policies and procedures in place which ensure the following:</p> <ul style="list-style-type: none"> <li>Those interpreters must certify that they will deliver interpretations that are accurate and not biased?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>Those interpreters shall accept payment for services only from the LWDA and never from the client?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>After applying the 4-Factor Analysis, and if the need for translation of vital documents is reasonable and necessary, does the LWDA provide written translations of :</p> <ul style="list-style-type: none"> <li>Consent and complaint forms?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>A list of One-Stop partners</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
and services offered?					
• Appeals documents?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Notices requiring a response from clients?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Information on the right to file complaints of discrimination?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Information on the provision of services to individuals with disabilities?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• State wage, hour, safety, and health information?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Notices of free language assistance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have procedures and policies in place which ensure planning and development of:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
• Methods of identifying LEP individuals who need language assistance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
<ul style="list-style-type: none"> <li>• Training for staff on the available language services and how to use them?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Easily-accessible and widely-known notices of free language assistance?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Training staff on monitoring interpreter activity?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Does the covered LWDA have policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to qualified individuals who have physical and/or mental impairments?</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Does the covered LWDA have policies and procedures in place that ensure that individuals with qualifying disabilities will be referred for auxiliary aids and services?</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Does the LWDA have in place communication devices, such as TTY or TDD, or an equally effective communication system, for participants with a hearing impairment?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
If the LWDA has determined that the provision of accommodations would fundamentally alter the delivery of program, service, or activity, then does the LWDA have a written statement which details the reasons for reaching this conclusion?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have clearly visible signage, at the primary entrances of each inaccessible facility that refers individuals, with disabilities, to information about accessible facilities?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have the international symbol for accessibility at the primary entrances of each accessible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
facility?					
<p>Do the LWDA's published personnel policies and procedures prohibit actions defined in Section 37.11 of the implementing regulations? These are:</p> <ul style="list-style-type: none"> <li>• Intimidation and retaliation for filing a complaint or furnishing information regarding management of a WIOA assisted program, service, or activity.</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<p>Is the initial and continuing notice provided that discrimination is prohibited? Is it:</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• In internal memoranda, both hard copy and electronic?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• In handbooks or manuals?</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<ul style="list-style-type: none"> <li>• Made available</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
to each participant and included in the participant's file?					
<ul style="list-style-type: none"> <li>Made available, in appropriate formats, to individuals with visual impairments</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Do the LWDA's orientations and other presentations to new employees, participants, employers and the general public include a discussion of the nondiscrimination and equal opportunity provisions applicable to WIOA programs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA system have a complaint log which is used to record any complaints of discrimination?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA have documentation to ensure that all On-the-Job Training plans, contracts, and other similar agreements are non-discriminatory and contain provisions regarding non-discrimination and	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
equal opportunity?					
How does the LWDA provide disability awareness training for designated staff at the One-Stop Center?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Has the contract agency received any discrimination complaints during the last fiscal year or during the current contract year? Explain.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
What assurances of compliance have been signed by the agency?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
When and by who were they signed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
What documentation does the agency keep as proof of its non-discriminatory status?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		



**WORKFORCE INNOVATION & OPPORTUNITY ACT MONITORING TOOL  
STATEWIDE AND REPORTS PROGRAM QUESTIONNAIRE**

**Subrecipient:**

**Completed by:**

**Date:**

**TDLWD Monitor:**

**Review Date:**

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
Has the contractor submitted quarterly reports on a timely basis?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Does the LWDA reach those who are underemployed, because of their lack of certification, or expect to become employed, as a result of their participation in the program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
In providing participant services, has the LWDA met the eligibility requirements of the target group to be served through the incentive grant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
If the quarterly expenditure goals have not been met, has the	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

Question	Yes	No	NA	Comments	(For TDLWD Monitor Use Only) Verified and Comments
contractor/LWDA provided an explanation, in writing, to the state in the quarterly report?					