

## SUB-RECIPIENT CONTRACT MONITORING POLICY

Policy #15-22  
Revision #2  
Effective Date: 10/9/18

### 1. Purpose

Opportunity Inc. will formally monitor all program services sub-recipient contracts on a program year basis or as required by any funding source or grantor. The purpose of the monitoring review is to conduct oversight activities in order to ensure compliance with the terms, conditions, stipulations, deliverables and performance metrics specified under each contract, as well as, compliance with applicable Local, State and Federal policies and rules. A list of basic monitoring review elements is shown on Attachment I.

### 2. Review Scheduling

A schedule of contract monitoring reviews will be developed and communicated to the contractors by the Workforce Services Officer and Youth Program Coordinator.

### 3. Process Steps

- A. The Workforce Services Officer, in conjunction with the Youth Program Coordinator, have the primary responsibility for the conduct of the monitoring review process. In that regard, they will coordinate with the Vice President for Finance and Administration regarding all contracts and will also coordinate with the Senior Director of Youth Initiatives and Community Affairs regarding the monitoring of youth program contracts. The aforementioned staff will serve as the primary monitoring review team. Other Opportunity Inc. staff may participate in the monitoring process.
- B. A desk review will be conducted to review the contract, prior program monitoring review results, contract related correspondence, related fiscal issues, program statistical performance and any other applicable issues related to the contract operations.
- C. An entrance conference will be held with each contractor at the beginning of the monitoring review. The purpose of this conference is to inform the contractor of the scope of the monitoring review, make appropriate scheduling arrangements, to discuss applicable contract operations and to request specific information and records needed for the review. The entrance conference may be conducted either in person or via the telephone.
- D. An on-site review will be conducted at the contractor's primary physical site and may also be expanded to other related service delivery site locations if necessary. On-site review activities may include a review of participant records; tests of financial transactions and reviews of

related documentation and financial records; review of program service delivery practices and operational strategies; interviews with staff; interviews with participants; observations of facilities, and verification of contract services.

E. The results of the monitoring review are recorded and documented on various spreadsheets and notes maintained in the contract monitoring review work papers. Additional worksheets, interview questionnaires, and specific written correspondence may also be developed and used based on need. It is the practice of Opportunity Inc. to discuss any issues or concerns identified during the monitoring review with the contractor while the process is ongoing.

F. An exit conference may be held with the contractor at the end of the monitoring review. This conference may either be in person or via the telephone. The exit conference will be facilitated by the Monitoring Review Team.

#### 4. Monitoring Report

The draft monitoring review report will be prepared by the Youth Program Coordinator, in conjunction with the other members of the Monitoring Review Team, upon the conclusion of the monitoring review. The report will be submitted to the Vice President for Administration and Finance and the Vice President for Workforce Innovation for review and approval. The President and CEO will make the final approval and the final report is then sent to the contractor. It is expected that the report will be submitted to contractors within sixty (60) days after the date of the exit conference or at the end of the review. A copy of the final monitoring review report will be maintained in the contract file.

#### 5. Monitoring Findings or Concerns

In cases where a monitoring report contains findings and/or concerns, a corrective action plan may be requested, and/or other action directed and will be included with the delivery of the final report to the contractor. In the event that a corrective action plan is requested, the specific area to be addressed will be identified and a timeframe for the submission of the plan will be specified. In addition, the corrective action plan must be signed and dated by authorized contractor staff. The Workforce Services Officer and the Youth Program Coordinator will approve the plan and, if necessary, work with the contractor for implementation. A determination of compliance with the plan will be completed either before or in conjunction with the next monitoring review.

# ATTACHMENT I

## BASIC MONITORING REVIEW ELEMENTS

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#### Overview

The following basic monitoring elements will be reviewed for compliance with the contract, as well as compliance with State, federal and Opportunity Inc. policies and rules. The scope of the monitoring review may be expanded, and/or additional monitoring review elements may be added during the conduct of the monitoring review if required. Documentation for the review of each element will be maintained in the monitoring file.

#### Element 1 – Participant Records

Focus Areas: eligibility determination, verification and documentation; case notes; Individual Service Strategy (ISS) development, reviews and updates; participant attendance; assessment; confidentiality of participant records; participant service referral and tracking.

#### Element 2 – Service Delivery

Focus Areas: contract proposal; participant services provided by the contractor and/or provided by another organization; participant outreach, recruitment and selection; participant incentives; staff and participant interviews; programmatic policies and procedures; worksite/internship site development; partnerships with other organizations; relationships with employers, where applicable; physical program services facility(s); staffing.

#### Element 3 – Fiscal Management

Focus Areas: allowable costs; adherence to budget line items; invoice selection and testing; equipment, program income, cost allocation: audit report and requirements; accuracy and timeliness of fiscal billing/reporting.

#### Element 4 – Performance Metrics

Focus Area: analysis of actual participant performance outcomes related to contractually specified “real time” and applicable DOL performance measures goal values.

#### Element 5 – Participant Reporting

Focus Areas: accuracy and timeliness of designated participant case management system entries and reports submitted to Opportunity Inc.; assigned staff and related training; documentation for reported participant “real time” and DOL performance measures outcomes; and, documentation for reported participant global exclusions.

#### Element 6 – Internal Controls and Administrative Practices

Focus Areas: fiscal management; participant eligibility; records maintenance and data validation; service delivery; participant performance tracking.

#### Element 7 – Equal Opportunity (EO), Civil Rights and Related Grievances

Focus Areas: visible postings; assigned staff; participant notification.