

State of Alaska
Department of Labor and Workforce Development

Division: Employment and Training Services (DETS)

Policy: 07-543

Subject: Wagner-Peyser Program Monitoring Plan and Policy

Pages: 5

References: [Federal Register 2 CFR Part 200.328 Monitoring and Reporting Program Performance](#); [8 AAC 87.170 Records Inspection and Retention Program Monitoring](#); [20 CFR Part 683, Subpart D. Oversight and Resolution of Findings](#); [Workforce Innovation and Opportunity Public Law 113-128](#); [Single Audit Act of 1984, as amended in 1996](#); [31 USC Chapter 75 – Requirements for Single Audits](#); [2 CFR Part 200](#); [2 CFR Part 2900](#); [29 USC 3003 State grants for assistive technology](#); [20 CFR Part 651 General Provisions Governing the Wagner-Peyser Act Employment Service](#); [20 CFR Part 652 Establishment and Functioning of State Employment Service](#); [20 CFR Part 653 Subpart B Services for Migrant and Seasonal Farmworkers \(MSFWs\)](#); [20 CFR Part 658 Administrative Provisions Governing the Wagner-Peyser Act Employment Service](#); [29 CFR 38.5 General Prohibitions on Discrimination](#); [Wagner-Peyser Act of 1933, as amended](#); [UIPL No. 14.18 Unemployment Insurance and the Workforce Innovation and Opportunity Act](#); [Alaska One Stop Certification Policy 100-2017, and application for certification](#); [Monitoring and Single Audit Policy 07-523](#), [Allowable Cost Guidelines Policy 07-520](#), [Cash Management Policy 07-504](#), [Data Integrity Policy 07-541](#), [Job Center Universal Access for Customers with Disabilities Policy 07-516](#), [Equal Opportunity Discrimination Complaints Policy 07-506](#), [Program Complaint and Appeal Policy, Notice, and Forms 07-510](#), and [Incident Reporting of Fraud, Waste, or Abuse Policy 07-536](#)

Effective:

Approved: Patsy Westcott
Patsy Westcott, Director, DETS

2.24.23
Date

1. Parties Affected:

Division of Employment and Training Services (DETS) staff, and Alaska Job Center Network job centers (job centers) receiving public funds to deliver Workforce Innovation and Opportunity Act (WIOA) Title III/Wagner-Peyser Act employment services.

2. **Background:**

WIOA Title I and Wagner-Peyser Monitoring Responsibility, 20 CFR 683.400(c) requires the development of a state monitoring system for WIOA Title III Wagner-Peyser Act programs. In accordance with 20 CFR 683.410(b)(2), the monitoring system must:

- provide for annual monitoring reviews of local areas' compliance with 2 CFR Part 200 (Fiscal Compliance Cost Principles) and Department exceptions at 2 CFR part 2900, as required by sec. 184(a)(3) of WIOA
- ensure that established policies to achieve program performance and outcomes meet the objectives of WIOA and WIOA regulations
- enable the Governor to determine if Alaska job centers have demonstrated substantial compliance with WIOA and Wagner-Peyser Act requirements
- enable the Governor to determine whether a local plan will be disapproved for failure to make acceptable progress in addressing deficiencies, as required in sec. 108(e) of WIOA
- enable the Governor to ensure compliance with the nondiscrimination, disability, and equal opportunity requirements of sec. 188 of WIOA, including the Assistive Technology Act of 1998 (29 USC 3003)

The Governor must:

- require that prompt correction action be taken if any substantial violation of standards is identified (20 CFR 683.410(b)(4))
- impose sanctions provided in secs. 184(b) and (c) of WIOA upon failure to take required corrective action required under paragraph (b)(4) of this section (20 CFR 683.410(b)(5))

Monitoring consists of a review of both financial and programmatic elements. The **financial management system** for Alaska job centers must:

- provide fiscal control and accounting procedures to permit timely preparation of reports;
- permit the tracing of funds to establish utilization of funds for allowable activities only;
- demonstrate compliance with matching requirements, cost limitations, and correct classification of costs;
- provide the correct allocation of costs by adopting consistently applied methods that reflect a reasonable relationship for cost benefit; and

A job center's **program operations** must:

- include practices to ensure achievement of program quality and performance goals
- align with the policies, guidance, and directions issued to support program performance
- reflect appropriate program practices and procedures for priority of service, participant eligibility, assessment, planning, referral and placement, and other requirements under WIOA Title III, the Wagner-Peyser Act, and regulations
- comply with nondiscrimination, disability, and equal employment opportunity

requirements of WIOA Sec. 188

Alaska job centers are also subject to audit requirements commonly referred to as “single audits” under the [Single Audit Act of 1984, as amended in 1996](#). The Single Audit Act standardizes the requirement for auditing if job centers meet or exceeds the federal or state single audit thresholds during a fiscal year unless exempted by state law or governing federal authority. The federal single audit threshold is established by the United States government and the state single audit threshold is established by the State of Alaska.

3. Policy:

In addition to certification by AWIB according to [One Stop Certification Policy 100-2017, and application for certification](#), Wagner-Peyser program delivery and compliance at Alaska’s 14 job centers will be monitored annually. DETS will determine if an on-site or desk monitor will be conducted based on the monitoring requirements, past performance of the job center, and other factors. DETS may waive on-site monitoring or may require supplementary monitoring if warranted. Reviews may include, but are not limited to, examining program records; interviewing staff, participants, and employers; and observation of orientations, workshops, appointments, and other programming. To the extent practicable, monitoring will be conducted to minimize on-site monitor disruption and time requirements placed upon the job center, conducted according to a standard financial and program monitoring guide for consistency, and timely, with a formal, written monitor report issued within 30 days of the termination of the monitoring process.

Fiscal Monitoring:

DETS will assist the Alaska Department of Administration, Division of Finance by annually reviewing single audits conducted in compliance with [Alaska Monitoring and Single Audit Policy 07-523, Allowable Cost Guidelines Policy 07-520, Cash Management Policy 07-504, and Allocating](#), to determine whether findings of non-compliance, questioned costs, or inaccurate reporting of amounts exist; and, if applicable, whether a corrective action plan is acceptable or the recapture of disallowed costs is warranted.

Alaska Job Center Network Program Performance:

Monitoring will ensure that the delivery of services in each Alaska job center is compliant with WIOA and Uniform Administrative Requirements by reviewing practices and guidance relating to program activities including but not limited to:

- Eligibility determination
- Outreach to populations with and assessment of customer’s employment barriers
- Individual Employment Plans

- Provision of Career Services and Universal Access
- Referral to Title I Training Services where appropriate
- Functional and programmatic integration
- Performance accountability
- Customer satisfaction
- Staff training participation
- Partnership
- Employer services and engagement
- System and technology requirements

Special program areas:

3.1 Data Validation and Self-Appraisal:

The most recent results of job center data validation review according to Alaska [Data Integrity Policy 07-541](#) and procedures as well as Self-Appraisal System Enrolled Individual, Employer, and Job Order review results compiled per 20 CRF 658.601 and department procedures will be incorporated in the annual monitoring process.

3.2 Universal Access:

Alaska job centers will be reviewed for compliance with [Job Center Universal Access for Customers with Disabilities Policy 07-516](#).

3.3 Equal Opportunity Practices:

Job centers will be monitored for staff training and compliance with non-discrimination requirements of WIOA sec. 188, 29 CFR 38.5, and Alaska [Equal Opportunity Discrimination Complaints Policy 07-506](#) including:

- Verification that “Equal Opportunity is the Law” posters appear prominently in public spaces
- All customers are made aware of complaint procedures and rights
- Accessible entrances are clearly marked
- If a customer requires language assistance and is unable to identify the language in which they require assistance, staff direct the customer to appropriate telephonic assistance for translation services

3.4 Program Complaints:

Job centers will be monitored for staff training and compliance with Alaska [Program Complaint and Appeal Policy, Notice, and Forms 07-510](#) and procedures; complaint log, quarterly reporting, and resolution; display of complaint system poster; familiarity and compliance with State Monitor Advocate complaint review; and familiarity and compliance with Alaska [Incident Reporting of Fraud, Waste, or Abuse Policy 07-536](#).

3.5 Migrant and Seasonal Farmworkers:

Job centers will be monitored for staff training and compliance to ensure understanding of Migrant Seasonal Farm Workers needs and requirements under 20 CFR 653, including appropriate workforce development activities, data collection and performance accountability, and outreach responsibilities.

3.6 Unemployment Insurance:

Job centers will be monitored for staff training and compliance to ensure familiarity with unemployment insurance eligibility requirements, data collection, and implementation of Reemployment Services and Eligibility Assessment (RESEA) requirements and data collection.

3.7 Customer Satisfaction:

Results of quarterly Customer Satisfaction Surveys for individuals and employers obtained according to DETS procedures will be incorporated into monitoring results.

4. Monitoring Report, Corrective Actions, and Tracking:

The written monitoring report will be issued within 30 business days from the conclusion of the monitoring review. The report will be distributed to the job center regional manager and job center managers, DETS Director's Office, and the AWIB Executive Director.

If there is a finding, the job center or region monitored is required to respond within 30 calendar days after receipt of monitoring results. If findings are significant in terms of failure to perform, include serious infractions of oversight, or if monitor subject fails to timely remedy findings, the matter will be presented to AWIB as it relates to the job center's ability to fulfill its functions for further corrective action and/or request for monthly progress reports until the findings are remedied. Once all findings have been resolved, a resolution letter will be distributed to all monitoring report recipients.

Monitor tracking systems will be employed to ensure timely, regular monitoring of job centers as well as monitoring reports, findings, and resolutions.

5. Wagner-Peyser Monitoring Plan:

Monitoring of Alaska job center performance and review of single audits will be conducted annually by DETS by region on a quarterly basis: South Central during PY Q1, Gulf Coast PY Q2, Southeast PY Q3, Interior/Northern/Southwest PY Q4.