

**EDIC/BOSTON**

**OFFICE OF JOBS AND COMMUNITY SERVICES**

**PROGRAM MONITORING**

**GUIDE**

# **PROGRAM MONITORING GUIDE**

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## **MONITORING GUIDE**

### **JOBS AND COMMUNITY SERVICES/PROGRAM MANAGEMENT DIVISION**

#### **1.0 INTRODUCTION**

The Program Management Division of the Jobs and Community Services Department of the Economic Development Industrial Corporation (EDIC) of Boston is responsible for the monitoring of all agency-sponsored employment and training contracts. The goals of this monitoring are to: guarantee the quality of funded employment and training services to Boston residents; ensure that adequate administrative systems are in place and that funds are spent properly; identify programs in need of technical assistance; and verify contractors' compliance with federal and state regulations, EDIC policies and procedures and terms and conditions of the contract.

EDIC's monitoring effort involves four distinct activities: monthly performance review of each contract or grant, as appropriate; monthly management review of all contracts and grants; annual site visits; and provision of technical assistance and/or invocation of corrective action. The following describes the operational standards of EDIC's monitoring system.

#### **2.0 MONTHLY PERFORMANCE REVIEW**

The Adult Services and Youth/Special Projects units of EDIC/JCS' Program Management Division are responsible for monitoring all workforce development contracts, including but not limited to:

- Workforce Investment Act (WIA)
- Welfare To Work (WtW)
- DTA's Employment Services Program (ESP)
- DOL funded Discretionary/Demonstration Grants
- National Emergency Grants (NEG)
- Neighborhood Jobs Trust (NJT)
- Youth Opportunity Grant (YOG)
- Alternative Education Initiative (AEI)

Program Managers, Program Coordinators, and Contract Administrators meet monthly to conduct a performance review for each contract (on occasion a two-month period is reviewed). The purpose of the performance review is to analyze the program performance and administrative responsiveness of each contract for the previous month(s).

In preparation, staff review all relevant documents which vary depending on grant/funding source: monthly narrative reports; monthly management reports from EDIC's Computer Services which summarize quantitative data on vendor performance and provide demographics; planned enrollment and outcome data; all correspondence for the month between EDIC and the contractor; invoice reports generated by EDIC's Administrative and Finance Department; and site visit reports.

Based on the information from these sources and the staff's interaction with the vendor, a monthly performance review is completed for each contract. In a formal meeting with the Program Manager, the Coordinator or Contract Administrator then presents the report with the backup documentation.

Program Managers report to their respective supervisors informally in regular supervisory meetings and more formally to EDIC's executive staff through any of the following meetings depending on timing and scheduling:

Contract Management Task Force  
Senior Staff Meetings  
Executive Staff Meetings

Key elements of the organization are represented within one or more of these forums and include fiscal, contracts, MIS, planning and program management staff. A typical format would include a performance summary by the Program Manager highlighting strengths, weaknesses and problem areas by program and by grant. When performance issues arise, a discussion ensues which forms the basis of a plan of action. The plan is followed up by the Program Manager and the appropriate staff person with the requirement that progress reports be provided to the group.

### **3.0 DATA ANALYSIS FOR PROTECTED GROUPS**

By grant/title level and activity level, EDIC analyzes participation and evaluates the effectiveness of programs and services in meeting the needs of protected groups. Data analysis is conducted at least once per year, though EDIC strives to complete quarterly reviews. The analysis occurs in conjunction with program monitoring and with the goal of identifying any deficiencies or patterns of discrimination. Data analysis for protected groups is also part of an annual performance review conducted by Boston's Workforce Advisory Group (WAG). This group, sponsored and staffed by EDIC and the Boston PIC, is composed of community based organizations representing youth services, adult literacy, and job training as well as representatives of the Commonwealth Corporation and the

Department of Transitional Assistance. The WAG reviews WIA performance and demographics on a quarterly basis. This in-depth review becomes an important part of Boston's planning process.

#### **4.0 SITE VISITS FOR CONTRACT OVERSIGHT**

EDIC monitors all group contracts at least once and ideally twice per year. Program Coordinators and Contract Administrators serve as the primary monitors though Program Managers and other EDIC staff visit sites on a selective basis as part of a team approach. Site visits are timed to maximize the effectiveness of monitoring for quality and compliance. The first visit is usually more comprehensive with a focus on administrative systems, compliance and quality. Subsequent visits typically focus on quality and/or involve special events such as a graduation.

- **Quality Review**

EDIC reviews the quality of services for each contract. Quality is evaluated through classroom observations, staff interviews, participant interviews, and participation in other activities such as graduations, advisory board meetings, etc.

At a minimum, the following elements will be reviewed:

- applicant enrollment/intake orientation
- participant counseling/case management
- participant assessment and goal setting (individual service strategy)
- education/training instruction
- job development/placement activity
- support services
- follow-up services/activities

#### **5.0 SITE VISITS FOR INDIVIDUAL TRAINING ACCOUNTS (ITA'S)**

Individual Training Accounts (ITA's) for the adult system will be monitored throughout the fiscal year. Since ITA's are released in July, November and March, these time periods will be incorporated as part of the formula for selecting and establishing monitoring priorities. In addition, we will monitor from two perspectives:

- the customer (random sampling)
- the vendor (based on risk factors)

ITA's will be monitored based on a random sample of twenty-five percent (25%) for Title IA (economically disadvantaged) and Title ID (dislocated worker)

customers. As an overlay to the sampling methodology, staff will also consider other risk factors in developing a comprehensive monitoring plan, including:

- New vendors/new programs
- Programs with more than 10 ITA's
- Those vendors/programs about which we have received negative feedback from customers, career center staff, etc.

Customer interviews and on-site observation are critical monitoring elements. To the extent possible, monitors will strive to interview vendor staff as a means of verifying relevant information and as part of the compliance and quality review. In particular, monitors will document the provision of support services and job placement assistance for those programs that market these components as part of their WIA training design. Experience has shown that there often is a discernable difference in levels of participation in the monitoring process between community-based organizations and proprietary institutions usually depending on size and structure.

Plans are set for the first time to augment the FY'03 youth system by adding twenty (20) ITA's as part of WIA. It is expected that there will be a limited number of training vendors. EDIC's Youth department plans to monitor all of the ITA training sites.

## **6.0 PROVISION OF TECHNICAL ASSISTANCE**

EDIC is committed to providing technical assistance to vendors. The vast majority of assistance we provide is handled individually with vendors and is usually in response to a request communicated in a monthly narrative report or through site visits. Technical Assistance is also initiated by monitoring staff as a follow up to findings.

EDIC in partnership with the Boston PIC sponsors a wide range of program operator meetings for vendors as a regular "best practice". The regularity of meetings depends on the grant and the needs of the group. Under WtW, meetings for case managers occur on a monthly basis. A "Welfare Stakeholders" meeting is held quarterly for vendors, DTA staff and specialists from child care, transportation, etc. EDIC meets monthly with Boston's three career centers to provide on-going staff training and to review and problem solve on WIA and other grant issues. EDIC and the Boston PIC formed a "Best Practices" workgroup shortly after the start of WIA to address implementation issues. The workgroup is composed of training vendors and career center staff. WIA training vendors will meet in the future at least once annually. Each of these meetings typically provides information sharing, networking, training and staff development opportunities for those in attendance.

## 7.0 CORRECTIVE ACTION

Corrective Action is the process that occurs prior to contract suspension and/or termination and the de-obligation of funds, and after all other technical assistance efforts have been taken and are proven to be ineffective to resolve the problem(s). The Corrective Action process outlined below applies more to group contracts and less to an ITA system. Poor performance in an ITA system is addressed through the “report card” process initiated by the state. Therefore, it is more likely that corrective action in an ITA system would result from monitoring findings with the training vendor.

EDIC Program Management will initiate corrective action in the following situations:

- (1) when a regulatory violation has occurred;
- (2) when participants’ health or safety is threatened;
- (3) when primary contracted services have not been delivered;
- (4) when funds have been improperly expended; or
- (5) in the event that performance is significantly below plan

The first step EDIC takes when a problem is identified is to offer technical assistance particularly when dealing with the “gray area” of the non-delivery of services. Program Managers and staff will propose a course of action and a timeline for completing it. If there is a failure to meet contractual goals or performance standards, a judgment call must be made. For example, if a training program falls 15% below planned enrollment levels, a determination must be made as to whether the problem is specific to that program’s operations, or if the numbers reflect a system wide problem that requires a citywide or statewide technical assistance strategy. A decision will then be made about whether the corrective action plan is appropriate or that performance goals need to be revised. In the event that corrective action is deemed necessary, the overall process is as follows:

- Step 1:** Confirmation of the situation requiring corrective action. The Program Coordinator or Contract Administrator confers with the Program Manager.
- Step 2:** The Program Manager notifies the appropriate Deputy Director to clear issuance of corrective action.

- Step 3:** A formal written corrective action letter is issued to the vendor, to include:
- description of the problem;
  - how problem was identified;
  - effect problem has on program/client service;
  - vendor will be asked to develop a corrective action plan which documents measures to be taken and time frame to correct the problem(s)
- Step 4:** Program Management Division staff will review the corrective action plan from the vendor and either approve or disapprove. If the plan is disapproved, Program Management will meet with the vendor to discuss areas in the corrective action plan requiring further explanation/modification in order to make the plan approval. Failure on the part of the vendor to submit a corrective action plan may result in contract termination or suspension and/or de-obligation of funds or the suspension of any new approved ITA's.
- Step 5:** EDIC will monitor the approved corrective action taken as outlined in the plan and ensure the problem(s) has been resolved.
- Step 6:** Failure to reach resolution may result in the initiation of a contract suspension or termination process and/or the de-obligation of funds. In the case of WIA ITA's, failure to reach resolution will likely result in the suspension of ITA approvals.
- Step 7:** In the event the determination has been made to initiate contract suspension or termination and/or the de-obligation of funds, or the suspension of ITA referrals, EDIC will send the vendor a letter (Certified Return Receipt Requested) informing them of the decision.

