

**Southern Nevada Workforce Investment Board
General Policy & Procedure
COMPLIANCE ASSURANCE REVIEWS**

EFFECTIVE DATE: July 11, 2003

NUMBER: 5.5

**Supercedes SNWIB General Policies and Procedures
No. 5.5 dated 7/1/2000**

AUTHORIZATION: SNWIB

BACKGROUND:

This policy shall be used in conjunction with the Southern Nevada Workforce Board's Compliance Review and Monitoring Plan. On-site compliance assurance reviews shall be conducted by appropriate SNWIB staff members working together as teams to ensure expertise for program and fiscal oversight. The Southern Nevada Workforce Investment Board (SNWIB) shall develop schedules for compliance assurance reviews no less than twice each year. Service providers shall be notified at least (30) thirty days in advance of on-site compliance reviews. The purpose of advanced notification of on-site monitoring reviews is to allow service providers to schedule appropriate activities and staff to help facilitate productive and effective on-site compliance reviews.

I. GENERAL PROVISIONS FOR PERFORMANCE OF COMPLIANCE ASSURANCE REVIEWS

- A. Upon development of the compliance assurance review schedule, a notification letter will be sent to service providers at least 30 days prior to the scheduled visit. Compliance review visits and notification to service providers shall be scheduled by the SNWIB compliance review staff.

Compliance review visits notification letters shall include:

1. Scheduled dates of review
 2. Locations
 3. Times set for entrance and exit conferences with appropriate staff
 4. Specific programmatic focus, i.e., grant to be reviewed
 5. Request for completion of appropriate provider questionnaires (if applicable)
- B. An on-site "Entrance Conference" shall be conducted prior to the compliance assurance review. The purpose of the entrance conference is to discuss the need for compliance assurance, and to establish a cooperative working relationship with service providers using the following objectives:
1. Description of the scope of the on-site compliance assurance review, including topic, report format/distribution, process for resolution of findings, etc.

2. Any new developments affecting the service providers, such as new programs/staff, coordination efforts with other entities, etc.
 3. Lists such as equipment inventory, fiscal records, or participant files that are to be reviewed by the compliance assurance team in hard copy.
- C. Each SNWIB compliance assurance review team member shall be assigned a subject matter area to review, such as eligibility, EEO/grievance compliance, fiscal, and programmatic services provided. During the compliance assurance review process, SNWIB will examine the records requested and complete necessary checklists and create appropriate working papers. These checklists and work papers shall become part of the compliance assurance review records.

The compliance assurance review team shall attempt to resolve potential findings, irregularities and/or omissions prior to the exit conference with appropriate service providers' staff.

- D. An "exit conference" will be performed after each compliance assurance review visit. The purpose of the exit conference is to provide the service provider with a verbal summary of the review and the reporting process of corrective action if required. The following topics shall be discussed during the exit conference:
1. Any issues, questions, findings, suggestions, etc.
 2. Provide compliance feedback and recognize best practices.
 3. Provide technical assistance as necessary.
 4. Reiterate report process and distribution.

II. **GENERAL PROVISIONS FOR COMPLIANCE ASSURANCE REVIEW REPORTS**

- A. Compliance review teams on-site reports are presented as final to the SNWIB Executive Director and/or designee within (10) ten working days after completion of the review.
- B. The deputy board manager or a designated programs specialist shall review the compliance assurance team reports and consolidate into final report format. This report shall be forwarded to the appropriate service provider no later than 30 days after the exit conference. Additionally, the SNWIB Executive and/or designee shall determine which of the following two irregularities categories will be identified in the compliance review report.
1. Observation: These are areas of concern or areas/activities needing improvement to help ensure the program/service success; however, such areas shall be addressed with recommendation and suggestions rather than corrective action. The service provider shall address noted observations internally—as a respond to observations is not required. All noted observations shall be reviewed during subsequent compliance assurance visits, and

the SNWIB must find evidence of appropriate action taken to address the observation. Noteworthy observations shall also be noted under the observation section of the compliance review report.

2. Finding: Findings identifying inappropriate practices or non-compliance noted during the on-site review shall be documented in the report. All finding notations shall be documented with appropriate paragraph references to federal, state, and local laws, regulations, statutes, and policies. Findings in compliance review reports shall include required “Corrective Action” to be taken on behalf of the service provider.
- C. Service providers are required to respond in writing to any findings documented by the SNWIB during an on-site compliance review. The SNWIB compliance review report shall indicate specific deadlines for corrective action (at least 30 days will be allowed) to be completed.
 - D. If the Service Provider does not comply with corrective action(s) as outlined in the report by the deadline established, sanctions shall be imposed as approved by the SNWIB Executive Director and/or designee (refer to SNWIB Policy 5.2 “Non-compliance Sanctioning Process”).