

Workforce System Guidance

TO: Local Workforce Development Board Chairs and Executive Directors
PA CareerLink® Operators and One-Stop Partners

FROM: Bureau of Workforce Development Administration (BWDA)

DATE: April 27, 2012

RE: Guidance Regarding Supervisory/Second Level Review of Eligibility Determinations

MESSAGE: Guidance Regarding Supervisory/Second Level Review of Eligibility Determinations

Purpose: The aim of this guidance is to offer technical support to local workforce stakeholders regarding the supervisory/second level review process for eligibility determinations by subrecipients serving Workforce Innovation and Opportunity Act (WIOA) participants. Previous audits have highlighted concerns raised by auditors regarding perceived gaps in oversight and monitoring by Local Workforce Development Boards, particularly in ensuring the accurate determination of program eligibility by subrecipients of WIOA participants. Notably, audits revealed that individual records provided by several LWDBs lacked evidence (such as documentation, notations, or initials) indicating the completion of a secondary review to validate participant eligibility. As a response, auditors recommended that the state implement a policy mandating LWDBs to establish local protocols for supervisory/secondary reviews and control processes at the subrecipient level, integrating these into their monitoring procedures.

Authority:

- [Pennsylvania Workforce Development Act, Section 304.](#)

1. Definitions:

- **Eligibility Determination** – the process of deciding if a prospective individual meets the requirements necessary to receive authorized services for a given program by a qualified staff member.
- **Supervisory/Second Level Review** – A review conducted by the supervisor, or above, of a qualified staff person of an eligibility determination.

2. Requirements – until a formal commonwealth policy can be executed as a new or revised Workforce System Policy (WSP), LWDBs are instructed to verify or implement the following procedures immediately:

- Establish a local written policy that requires a supervisory/second-level review of eligibility determinations for ALL WIOA participants by the subrecipients and includes documentation or notation that it was conducted and by whom. The documentation must be clear on who has conducted the review. One example that would meet this requirement would be a printed name, signature, and date on the application in the case file. There may be other methods that would fulfill the requirements of documenting supervisory/second level reviews.
- Share the policy with ALL WIOA subrecipients.

- Update LWDB monitoring guides to include a review and verification that a supervisory/second-level review of WIOA eligibility determinations is being conducted by subrecipients.
- Provide a copy of the newest version of the written local policy to BWDA via Oversight Services Resource account at RA-LI-BWDA-OS@pa.gov.

Based on email guidance from May 3, 2012, LWDBs should already have a policy in place and requiring subrecipients to conduct supervisory/second level eligibility reviews. If a LWDB has an updated policy already in writing, it may only need to determine how the reviews will get notated locally and it's policy provided to BWDA. Or a LWDB may need to update an existing written policy to include the requirement for documentation/notation and provide BWDA a copy of the revised policy.