

Policy & Performance Committee

Agenda

Zoom Video Conference Meeting
Wednesday July 29, 2026 10:00 a.m.

Introduction & Call to Order

J. Beamer

Public Comment

Review & Approval of Meeting Minutes

J. Beamer

Policy Review

K. Lucas/M. O'Hargan

- Action Needed: Policy on Policies
- Action Needed: Monitoring Policy
- Action Needed: WIOA Title I Program Complaint Policy and Procedures
- Action Needed: Conduct at PA CareerLink® Policy
- OJT Policy

Open Discussion

J. Beamer

Date of Next Meeting

J. Beamer

Adjournment

J. Beamer

Policy & Performance Committee

Meeting Notes August 28, 2025

The Policy & Performance Committee of Advance Central PA held a Zoom Video Conference meeting on Thursday, August 28, 2025.

The following members attended:

Jim Beamer
Talia Beatty
Beth Gilmore
Zollie Rayner
Susie Weller

The following members were excused:

Todd Taylor

The following staff attended:

Erica Mulberger
Marca O'Hargan
Kelly Walter

The following guests attended:

None

Welcome & Call to Order

The meeting was called to order at 9:02 a.m. by Jim Beamer, Policy & Performance Committee Chair. With several new members, Jim invited everyone to introduce themselves.

Public Comment

None.

Review & Approval of Meeting Minutes



Zollie Rayner made a motion to approve the May 10, 2023, Policy & Performance Committee meeting minutes. Beth Gilmore seconded the motion. The motion was unanimously approved with no abstentions.

Executive Session

Jim called for an Executive Session at 9:04 a.m. to discuss a customer appeal of a previous decision made by the Policy & Performance Committee. Jim called for non-members to be excused at this point, however there were no non-members present for this meeting other than staff. At 9:22 a.m. Jim called Executive Session closed and re-convened to the public meeting.

Open Discussion

Erica Mulberger, Advance Central PA Executive Director, reported that she and Marca O'Hargan, Advance Central PA Compliance Monitor, plan to work on a customer code of conduct for the Committee to review at a future meeting.

Erica also shared that the PA CareerLink® Operator has been working on implementation of customer service standards. Staff will review, edit, and approve prior to the Operator rolling it out.

Date of Next Meeting

LEO Prep Meeting – September 17, 2025 at 9:00 a.m.
Joint WDB/LEO Board – September 17, 2025 at 10:00 a.m.
Executive Committee Meeting – October 10, 2025 at 10:00 a.m.

Adjournment

With no further business to discuss, Jim adjourned the meeting at 9:25 a.m.

Respectfully Submitted,



Kelly Walter, Office/Board Coordinator

DRAFT



Policy on Policies

Advance Central PA's Policy Governance Framework

Implemented July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded with federal dollars. For more information, visit: <https://advancecentralpa.org/about-us/public-notices/>

Policy on Policies

Background

This Policy on Policies establishes a standard framework and process for developing, managing, and decommissioning of Advance Central PA policies. This policy ensures organizational accountability, transparency, and continuous improvement across the workforce development system and is developed in alignment with the PA Dept. of Labor & Industry Workforce System Policy by the same name: Policy on Policies.

This policy applies to Advance Central PA workforce policies.

Policy Categories

Advance Central PA categorizes policies into distinct categories as shown below along with the standing committee of the Workforce Development Board that may be charged with approval.

Category	Relevant Committee(s)
Financial Management	Audit/Finance
Program Management	Policy & Performance EARN Youth
Risk Management	Policy & Performance
Human Resources	Personnel

Policy Development and Revisions

A new policy or a revision to an existing policy may be triggered for many reasons, including but not limited to: new or changing federal or state regulation/legislation, monitoring findings, opportunities for continuous improvement and efficiencies, and new grants that are obtained.

Advance Central PA staff work collaboratively to develop, implement, and manage workforce system policy as outlined herein. Policies will utilize a standard format including documentation of the most recent revision/publish date.

Policies and revisions will be drafted by Advance Central PA staff and vetted internally by the Assistant Director and/or Executive Director and approved.

- New policies and substantive changes to existing policies will be brought to the appropriate standing committee of the Workforce Development Board for approval and the Executive Committee or full WDB for ratification unless they qualify as “fast-track”.
- Fast-track is an expedited process used to implement or revise policy when specific situations require immediate and/or clear action. Advance Central PA maintains authority to implement required policy outside the policy development processes outlined herein.

Situations that warrant fast-track status include but are not limited to:

- Non-substantive changes to existing policy such as formatting, updating hyperlinks, correcting typographical errors, etc.
- Federal or state mandates, directives, or policy changes that require immediate implementation with no local discretion
- New grants obtained that require specific policies tied directly to approved budgets with no additional local discretion, such a support service policy for a competitive grant which has a budget that outlines the amounts available.

Any policy enacted/revised under fast-track circumstances will be routed back through the regular annual review processes.

Documentation of Annual and Other Reviews

Advance Central PA will conduct an annual review of each active workforce system policy to ensure compliance and continued alignment with federal and state directives and local expectations. Additional reviews will be completed as necessary.

A **Policy Log** is maintained to detail policy implementation dates and annual review dates thereafter. Detail will be maintained as follows.

- New policies will be added to the log and document the implementation month/year along with whether it went through the regular approval process or the fast-track.
- When a review is complete and the policy is determined not to require any changes, the review month/year will be entered on the Log with a comment: Annual review completed. No revisions were required.
- When a review is complete and non-substantive changes are determined necessary, those changes will be made by staff with approval from either the Assistant Director or Executive Director. The review date will be entered on the Log with a comment: Annual review completed. Non-Substantive revisions were made including [insert a brief summary of changes, such as changing links, correcting spelling, re-arranging bullets, etc.]
- When a review is complete and substantive revisions are necessary, the log will be updated to include the month/year of the review, implementation month/year of those revisions, and whether it went through the regular review process or the fast-track.

Additionally, each policy will have a **Review Log** section that shows the annual reviews completed since the latest published revision.

Decommissioning of Policies

Policies that outlive their applicability due to changes in federal or state law, or changes in the larger landscape of Pennsylvania and or local workforce system programs, principles, or service-delivery processes, will be decommissioned.

The Advance Central PA Executive Director will review the recommendation to decommission a policy. Upon approval, the policy will be removed from SharePoint and notice will be sent to the policy's audience and any other affected parties and/or workforce system partners.

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
7/2027	TBD

DRAFT



MONITORING POLICY MANUAL

Revised July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

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MONITORING POLICY MANUAL

Overview

Purpose

Established as the fiscal agent for Workforce Innovation and Opportunity Act (WIOA) Title I and Pennsylvania Department of Human Services funds, Advance Central PA is responsible for overseeing, measuring, monitoring and determining compliance with implementation, operations and performance requirements for all contracted funds. Advance Central PA establishes guidelines designed to ensure that quality of services meet expectations. Further, Advance Central PA develops policies and methodologies for the reporting of performance on a routine and ongoing basis. To fulfill these obligations, Advance Central PA will perform the following duties on a regular basis:

- Objectively review program activities, operations, administrative, and fiscal practices of entities who contract with Advance Central PA to provide services or training.
- Identify existing or potential deficiencies and ensure required action plans are implemented
- Make recommendations on improvements to customer service and quality and highlight promising practices that are observed.

Goals

Advance Central PA sets these goals as an end result to any review or monitoring:

- Ensure program compliance in accordance with federal and state funding stream guidelines and Advance Central PA Policies.
- Promote program consistency and standardization
- Support efforts for continued improvement in program implementation
- Identify deficiencies and ensure corrective actions are put into place
- Initiate policy development and recommend procedural modifications
- Identify training and technical assistance needs
- Acknowledge promising practices

Components

Monitoring focuses on the following distinct areas.

1. Compliance
This component examines adherence to contract requirements, laws and regulations. The monitoring report must clearly state the deficiencies found and the actions required.
2. Quality
It is important to look beyond compliance and focus on the quality of services being delivered relative to costs. The monitor may make recommendations for improvement on processes and service delivery and/or recognize promising practices. Spotlighting promising practices acknowledges good work and also provides models of service delivery for the rest of the Region.
3. Performance
The monitor provides up to date information and reports to evaluate the likely outcome of program goals and performance standards. Analyzing performance reports helps to identify potential deficiencies and ensure positive future outcomes.

4. Technical Assistance

Questions often arise during monitoring, and technical assistance is delivered in order to help subcontractors clarify law or policy. The monitor will note technical assistance in the final monitoring report.

Types of Contracts Monitored

For effective and in-depth quality assurance reviews, each of the areas outlined below are evaluated on an on-going basis.

Conducted by Advance Central PA Fiscal Department

Entity use of Advance Central PA funds are monitored annually for non-discretionary grants. Entity uses of discretionary funds are monitored based on grantor requirements.

Areas examined include, but are not limited to:

- financial and internal control systems
- cash management
- payroll
- procurement
- property
- audit and internal monitoring
- separation of duties
- insurance coverage

Monitoring can take place more often than annually if deemed necessary. Standards are set by the United States Office of Management Budget Circulars, USDOL, the Commonwealth of Pennsylvania, Advance Central PA, and other granting agencies.

Conducted by Advance Central PA Operations Department

Key components of monitoring can include:

- On-site visits- can include direct observations, staff and customer interviews.
- File reviews- examinations of individual participant files, including those collected via random sampling.
- Desk reviews- collection of data and information as part of the monitoring process; can be stand-alone or part of the overall process to prepare a monitor for a site visit. Examples of documents that can be reviewed prior to a visit include, but are not limited to, sub-grant agreements, contracts, previous monitoring reports, corrective action plans, business plans, budgets, actual expenditures, property database, performance reports and other data points, and CWDS service record and case notes.
- Random sampling- selection of samples to be used to help identify compliance violations, questioned costs and/or potential weaknesses in performance.
- Surveys- may be used to help identify compliance violations, questioned costs or potential weaknesses in performance, as well as to capture promising practices or needs for technical assistance.

Additionally, a service provider's programmatic activities are monitored quarterly by way of a Quarterly Self-Monitoring report received from providers and reviewed by Advance Central PA staff. Specific requirements for Self-Monitoring reports are outlined in contract riders.

Advance Central PA conducts monitoring as detailed below.

1. PA CareerLink® Operations

Each PA CareerLink® site is assessed for compliance including access to services, quality, and performance **at least biennially**. Monitoring activities include on-site visits with direct observations staff interviews, and desk reviews. Additionally, monthly reports developed by Advance Central PA and completed by PA CareerLink® staff which include PA CareerLink® usage information, job seeker and employer participation data, and Rapid Response activities are reviewed by Advance Central PA staff and provided to WDB members. Standards are set by federal law, Commonwealth directives and policies, and Advance Central PA policies.

2. PA CareerLink® Operator

Monitoring of the Operator will be conducted at least annually and include the following: collecting and reviewing adherence to contract provisions, distributing and analyzing partner surveys, and other performance measures developed by Advance Central PA and consistent with PA CareerLink® certification requirements, such as evidence of continuous improvement.

3. WIOA Title I Adult/Dislocated Worker

A formal file review including a review of the overall program and delivery is conducted **at least once per program year** based on federal law, Commonwealth directives and policies, and Advance Central PA's contract rider(s) with the subrecipient(s) in addition to local policies.

Programmatic oversight occurs regularly via the Adult Program Coordinator staff. This includes formal monthly grant management meetings where service delivery, operations, data, and performance is proactively reviewed and strategized. Performance is specifically reviewed regularly, including thorough review of Common Measure denominator reports. Findings and concerns from this informal monitoring may be included in the formal annual monitoring or be factored into the risk assessment.

Additionally, a desk review is conducted for all participant cases with pending training contracts by the Contracts Coordinator with other staff as needed.

4. Adult Priority of Service (POS)

Quarterly reports are compiled to ensure that 51% or more of Adult training funds are being spent on POS participants. If the POS performance reveals that not enough funding is being provided to POS participants, Advance Central PA's fiscal department will restrict funding to Adult customers who meet POS until a proper balance is re-established.

5. WIOA Title I and TANF Youth Development Youth Programs

Formal file reviews including a review of the overall program and delivery is conducted at least once per program year for both Out-of-School and In-School Youth programs; based on federal law, Commonwealth directives and policies, and Advance Central PA's contract rider(s) with subrecipient(s).

Advance Central PA monitors youth work experiences for compliance and quality of services by means of site visits, interviews and desk reviews. The number of experiences monitored per program year is informed by program risk assessments or otherwise identified concerns.

Programmatic oversight occurs regularly via the Youth Programs Coordinator staff. This includes formal monthly grant management meetings where service delivery, operations, data, and performance are proactively reviewed and strategized. Performance is specifically reviewed regularly, including thorough review of Common Measure denominator reports for

WIOA youth. Findings and concerns from this informal monitoring may be included in the formal annual monitoring or be factored into the risk assessment.

Additionally, a desk review is conducted for all participant cases with pending training contracts by the Contracts Coordinator, with other staff as needed.

6. EARN (Employment And Retention Network) Program TANF and SNAP Only

File reviews are conducted annually and are based on federal Law, Pennsylvania Department of Human Services (DHS) policies and directives, and Advance Central PA's EARN contract rider(s) with subrecipient(s).

Programmatic oversight occurs regularly via the Adult Program Coordinator staff. This includes formal monthly grant management meetings where service delivery, operations, data, and performance are proactively reviewed and strategized.

Performance and operations are reviewed regularly outside of the formal monitoring, with Advance Central PA staff conducting regular oversight with desk reviews in order to submit required documentation to DHS each month, including for monthly desk reviews, performance reviews, and TANF Samples. Findings and concerns from this regular oversight process may be included in the formal annual monitoring or be factored into the risk assessment.

7. On-the-Job Training (OJT) Contracts

The greater of three (3) new OJT employers or 20% of total new OJT employers will be monitored each quarter. On-site visits are conducted to ensure adherence with the OJT contract and ADA/EO reasonable accessibility. Subsequent visits may be necessary depending on location change or any suspected problems. Standards are set by Federal law, Commonwealth directives and policies, and Advance Central PA On-the-Job-Training Policy.

Programmatic oversight continues throughout the OJT, including as reimbursement requests are received.

OJT Employers are entities that are contracted "vendors," rather than contracted service providers.

8. Training Provider/Vendor

Each program year, training providers must post their training program applications on CWDS for WDB and state approval. Advance Central PA along with BWDA reviews each training provider's course application on CWDS annually. Each course description must show a connection to a High Priority Occupation. This annual process ensures the validity of each training program offered to participants.

Training providers are entities that are contracted "vendors," rather than contracted service providers. Site-monitoring of vendors is conducted on a risk assessment basis. Compliance with Advance Central PA's Universal Contract is examined along with EO/ADA reasonable accessibility.

9. Other Grants

Additional grants are monitored according to the regulations of the granting agency, Advance Central PA's proposal to said agency, and compliance with the resulting contract provisions.

Methodology

Schedule

A schedule is developed to encompass all grants that require monitoring each program year. The schedule will be approved by the Executive Director.

Provider Risk Assessment

Advance Central PA monitors providers based on the level of risk assessment with at least one formal monitoring conducted each program year. Risk assessment results determine the frequency and manner of the oversight including the size of the monitoring sample. Monitoring may occur as established in the local oversight plan or may be prompted by some event such as a complaint, poor performance, negative managerial patterns, or unusual EO data. Factors that Advance Central PA considers regarding risk assessment are as follow.

1. A service provider who was not contracted with Advance Central PA in the last year.
2. New provider personnel or new or substantially changed systems.
3. The extent and results of Federal awarding agency monitoring (e.g., if the sub-recipient also receives Federal awards directly from a Federal awarding agency)
4. Evidence that a provider's internal operational and/or fiscal controls are lacking effectiveness.
5. Results of a provider's recent single audit.
6. Size of a provider's share of Advance Central PA's allocation.
7. Number of program or EO complaints/issues in last calendar year

Risk Assessment is scored as outlined in the chart below.

Provider Risk Assessment		Provider Score
1.	When was the last time the provider contracted with Advance Central PA? 0 =current provider of same contract in a prior PY, 10 = no contract in prior PY	
2.	Does the provider have new personnel (management or program) or substantially changed systems? 0 = little or no change, 8 = some change, 15 = extensive change	
3.	Does the provider have a history of disallowed costs, major deficiencies, or other monitoring findings from Advance Central PA contracts or other known federal awards? 0 = no deficiencies, 15 = one instance, 25 = more than one instance	
4.	Does the provider lack effective operational and fiscal procedures and controls? 0= no instances of noncompliance , 5 = a single instance of noncompliance, 20 = more than 1 instance of noncompliance	
5.	What is the provider share of Advance Central PA's contracted dollars for the FY? 0 = Less than 10%, 8 = 10%-25%, 15 = 25% or more	
6.	What is the extent of Single Audit oversight findings for the past 2 years? 0 = no findings, 8 = single instance of noncompliance, 15 = substantial findings	
7.	Number of program or EO complaints/issues in last calendar year 0 = None, 25 = One or more instances	
Risk Level 0-46 Minimal Risk, 47-60 Moderate Risk, 60-100 High Risk		

Training Provider/Vendor Risk Assessment

Risk Assessment is scored as outlined in the chart below.

Risk Assessment Chart - for Vendors		Vendor Score
1	When was the last site visit by a Advance Central PA staff member? 0 = 1-2 Years Ago, 5 = 3-8 Years Ago, 10=Never	
2	Has management of vendor changed? 0 = Little or no change, 8 = Some change, 15 = Extensive change	
3	History of disallowed costs and/or major deficiencies? 0 = No deficiencies, 15 = One instance, 25 = More than one instance	
4	Share of Contracted ITA Dollars in Current FY 0 = Less than 10%, 8 = 10%-25%, 15 = 25% or more	
5	Number of program or EO complaints/issues in last calendar year 0 = None, 25 = One or more instances	
Risk Level	0-46 = Minimal Risk, 47-56 = Moderate Risk, 57-90 = High Risk	

Intent to Monitor

The Monitor notifies the entity (subcontractor or vendor) of an intent to monitor. This notification, at a minimum, provides the following information about the review:

- Reason (compliance, risk assessment, Advance Central PA's contractual obligations, etc.)
- Advance Central PA staff responsible for conducting the review
- Scope (dates of service, types of programs, locations, etc.)
- Date of the review. Before a scheduled site visit, a mutually agreed upon review time and date will be confirmed between both parties. In advance of the visit, the monitor may provide a list of files to be pulled and the monitoring tool to be used.
- Advance Central PA reserves the contractual right to request files for review without prior consultation with the subcontractor or vendor. Advance Central PA also reserves the right to monitor without notice or without furnishing specifics about the monitoring in advance.

Sampling Strategy for Participant File Reviews

When conducting file reviews, the following sampling strategy will be used. The population for each funding stream will be defined as the customers enrolled or actively participating in an eligible activity during the program year being reviewed.

From that population, a reasonable representative sample will be chosen for review. The size of the monitoring sample will be determined in accordance with assessed risk level and oversight requirements. A minimum of one file will be reviewed from each PA CareerLink® office for WIOA and TANF programs, if applicable. If, during a file review, a concern is identified that warrants additional case review, the sample size may be increased without advance notice to the service provider.

A typical sample size is estimated at 5%, though Advance Central PA may select a pre-defined volume of samples at random to be used to help identify compliance violations, questioned costs and/or potential weaknesses in performance.

Adult Priority of Service Monitoring

The percentage of Adult participants receiving statutory, discretionary and non-POS services will be reviewed with a minimum requirement to serve no less than 50.1% of participants who meet statutory POS, and a long term goal aligned with the US Department of Labor's vision to meet 75%. The percentage of Adult POS participants served will be included in the formal monitoring of Adult programming each program year. If the percentage of statutory POS Adults served is less than 50.1%, a corrective action plan will be required from the subcontractor.

Advance Central PA will budget according to training threshold requirements. On a quarterly basis, Advance Central PA will monitor training activity to ensure compliance with the minimum number of POS Adults accessing training services. The percentage of Adults who access training services registered under statutory, discretionary, and non-POS eligibility will be compared. If by January of each program year, Advance Central PA determines the percentage of POS Adults who access training represent an average of less than 30% of all Adults receiving training services, Advance Central PA will implement measures to cease registrations of non-priority groups and such determination will be re-analyzed each month thereafter.

Monitoring Tools

Specific tools to measure compliance and performance will be utilized for each monitoring area. These tools are developed by Advance Central PA or are adaptations of state and/or federal instruments. Tools are revised and updated as changes in governmental regulations or Advance Central PA policies warrant. Each tool references the policies, laws and guidelines for which the individual questions are based, as appropriate. Monitoring tools contain elements required in state policy as follow:

- Name of the agency
- Name of the individual performing the monitoring
- Date of the monitoring
- Services or activities provided
- Total amount of the contract and sources of the funding
- Date(s) of the oversight activity
- Staff interviewed
- Summary of the results that include program strengths, concerns, deficiencies and areas where technical assistance may be needed

Exit Conference

Within ten days after the conclusion of both the data collection process and site visit for formal annual/biennial monitoring, an exit conference is held with appropriate representatives of the Subcontractor. The participants in the exit conference discuss highlights of what will be in the report and any necessary clarification should be provided at that time.

Reporting

Reporting and Resolution Requirements for Service Providers

Monitoring will result in a written report, even if no required actions are required. Advance Central PA has a formalized reporting and follow up process for several reasons. First, it provides a transparent paper trail for future State and Federal monitoring. Second, it allows the monitor to remain objective with the data collected and findings uncovered. Third it provides a mechanism for alerting not only the provider staff of the findings but also creating awareness within their leadership structure. Finally, it allows Advance Central PA to directly attach the monitoring reports to the expectations outlined in contracts and program riders.

For monitoring to be effective, it must be results-oriented and lead to implementation of immediate required action to ensure accomplishment of goals and objectives, continuous improvement activities, and to ensure persistent review and enhancement of service delivery.

The Monitor is responsible for conducting visits and monitoring for compliance, identifying issues and best practices, and writing a draft report. The final report goes through an internal Advance Central PA management review, and if applicable, at least one other person representing the program or fiscal department prior to release. **Management** sends the final report to the entity being monitored with a copy to their leadership and the WDB Chairperson. A summary of monitoring results is shared with the following WDB Committees, as applicable, in addition to being presented to the Workforce Development Board and Local Elected Officials Board quarterly.

Area/Contract Monitored	Reviewing WDB Committee
Fiscal and Administrative	Audit Finance
PA CareerLink® Operations	Policy & Performance
OJT Employer	Policy & Performance
Adult and Dislocated Worker Programs	Policy & Performance
Youth Programs	Youth Committee
Department of Human Services	EARN Committee
Other Grants	Relevant Committee, or if none, Executive
Vendor/Training Provider Monitoring	Policy & Performance

The monitored entity has 30 days to submit a corrective action plan (CAP) to Advance Central PA unless otherwise specified. Advance Central PA will confirm whether the plans are approved or require revision.

In the event of a finding related to a violation of the non-discrimination and equal opportunity provisions of WIOA, the guidelines outlined in 29 CFR §38.91-38.93 will be strictly adhered to, including formal notice to the Commonwealth. The 30-day response time is not applicable in such an instance, as urgent and immediate response is necessary in this case.

If Advance Central PA does not receive a response within the time period outlined in the monitoring report and/or deficiencies in compliance and/or quality continue, the respective WDB Committee exercises the right to recommend Breach of Agreement procedures be enacted as outlined in the respective contract.

There may be occasions when the severity or number of required actions would require a follow up monitoring visit or desk review to provide evidence of program or fiscal improvement. During the follow up review, small samples of customer files will be pulled and supplementary site visits or other activities will be conducted that provide evidence that required actions have been implemented successfully.

If a monitor observes that a particular aspect of Advance Central PA Policy is outdated or is unnecessarily causing customer service to suffer, modifications to Policy may result.

The following table provides an outline of the components of the monitoring report issued to service providers along with the expectations for each.

Terms	Meaning	Subcontractor Expectation
Contract Requirement	Language in Advance Central PA contract that is being referenced.	Understand that this is the standard by which the contract is monitored.
Reference	The law, policy or notice (such as an email from Labor & Industry) that issued this requirement.	Understand that reference language is used as a standard to which the contract is held.

Findings	Observations from the monitoring.	An observation in itself may or may not require a response.
Findings and Required Actions	Deficiencies identified that reveal non-compliance with applicable - Federal, state or Advance Central PA regulations, terms and conditions of an award or contract, - Federal, state or Advance Central PA policies and official directives.	Written response to Required Action within 30 days unless a violation of the non-discrimination and equal opportunity provisions of WIOA is found in which case immediate actions are required according to 29 CFR §38.91-38.93
Concerns and Recommendations	Issues, policies, or practices observed that are classified as “risk areas” or “red flags” that, if not corrected, could lead to an area of non-compliance in future monitoring. Each area of concern may have a corresponding recommendation for improving the issue/practice.	Although they require a written response, recommendations are not required actions, but subcontractors are encouraged to implement the recommendation for the purpose of improving the issue/practice.
Promising Practice	A recognized example of standard expected practice and/or innovative practice that exceeds expected standards.	Share with staff in order to highlight the promising practice and encourage continued/expanded use in order to improve service implementation.

Reporting and Resolution Requirements for OJT Employers and Training Providers

Employers are issued a post-visit letter by management only if there are any contractual concerns or deficiencies resulting from the site visit. The letter will address the areas of deficiency and detail what must be corrected to ensure the entity’s continued potential eligibility as an OJT employer with access to Advance Central PA funding, including for present and future OJTs.

Training providers are issued a post-visit letter by management only if there are any contractual concerns or deficiencies resulting from the site visit. The letter will address the areas of deficiency and detail what must be corrected in order to ensure the entity’s continued eligibility as a training provider with access to Advance Central PA funding.

Monitoring Records

Electronic copies are stored in the monitoring directory on the network. Monitoring records are maintained in accordance with the retention policy of each grant.

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
June 2022	Annual review completed. No revisions were required.
June 2023	Annual review completed. No revisions were required.
June 2024	Annual review completed. No revisions were required.
June 2025	Annual review completed. No revisions were required.



WIOA Title I Complaint and Grievance Procedures and Appeals Process Policy

For WIOA Title I Program Complaints and Grievances

Revised July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

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Advance Central PA WIOA Title I Program Complaint and Grievance Procedures and Appeals Process Policy

Purpose

In compliance with the Workforce Innovation and Opportunity Act (WIOA) of 2014 and for any other federal or state contracts passed through Advance Central PA, the Workforce Development Board for the Central Pennsylvania Local Workforce Development Area has implemented this WIOA Title I **Program Complaint and Grievance Procedures and Appeals Process Policy** outlining a uniform process for receiving, processing, resolving, and appealing complaints and grievances alleging violations of the requirements of WIOA Title I.

These procedures are established pursuant to:

- WIOA Section 181(c) Grievance Procedure
- WIOA Section 188 Nondiscrimination
- 20 Code of Federal Regulations (CFR) Part 683 Subpart F_ Grievance Procedures, Complaints and State Appeals Processes (20 CFR 683.600-620)
- 20 CFR 38 Implementation of the Nondiscrimination and Equal Opportunity Provisions of the WIOA
- Pennsylvania Department of Labor and Industry's (L&I) Office of Equal Opportunity (OEO) Nondiscrimination Plan
- Other applicable federal and state law and regulation

Regulatory (20 CFR 683.600)

Each Local Workforce Development Area, State, outlying area, and direct recipient of WIOA Title I funds (except Job Corps) must establish and maintain written grievance and complaint procedures.

This Policy is Implemented to Include Key Requirements:

- Establish a formal grievance and complaint process for WIOA Title I programmatic complaints.
- Provide information about complaint procedures to participants, partners, service providers, and other interested parties.
- Ensure complaint information is understandable to all affected individuals, including youth and individuals with limited English proficiency (LEP).
- Provide an opportunity for informal resolution and a hearing within sixty (60) days of filing a complaint.
- Allow appeals to the State when no decision is issued within sixty (60) days or when a party is dissatisfied with the local decision.
- Allow U.S. Secretary of Labor to investigate grievances and complaints when a state decision is not issued within 60 days; or a party receives an adverse state decision and appeals to the Secretary.
- Maintain complaint records and publicize complaint rights.

Scope and Audience

This policy is designed to ensure individuals, program participants and other interested parties that are affected by the local workforce development system can file grievances or complaints alleging violations of the requirements of WIOA Title I.

Who May File a Program Complaint or Grievance

Complaints or grievances may originate from WIOA Title I-funded facilities, programs, services and activities administered by or operated by the LWDB, PA CareerLink® Operator, and other LWDA affiliated entities including the following:

- PA CareerLink® program partners
- WIOA Title I program service providers and contractors
- Eligible Training Providers and other entities providing training services
- Affiliated entities which provide services, activities and supportive services within a LWDA's workforce delivery system

Note- the Job Corps program is excluded from these provisions and have their own regulatory requirements

The following individuals or entities may file a complaint or grievance alleging violations of the requirements of Title I of WIOA:

- Individuals; Program Applicants and Participants; Former Participants
- Employees
- Employers
- Service Providers
- Contractors
- Training Providers
- Labor Organizations
- Community Based Organizations
- Other Interested Parties

Reasons a Program Complaint can be Filed

A program complaint involves an issue with how program services are delivered. Complaints regarding the Equal Opportunity Policy should be submitted in accordance with Advance Central PA EO/Civil Right Discrimination Policy and Procedure. Complaints alleging discrimination or retaliation based on protected status must immediately be referred to the Equal Opportunity (EO) Officer.

Program Complaint Types

Examples of complaints covered under these procedures include:

- Denial of program access
- Eligibility disputes
- Improper termination from services
- Failure to provide required services
- Violations of WIOA Title I requirements
- Procurement disputes
- Misuse of WIOA funds
- Service delivery concerns
- Violations of local policy

Methods of Filing A Program Complaint/Grievance

Complaints may be filed:

1. In person
2. By mail
3. By email
4. Electronically
5. By telephone with staff assistance

Staff shall assist individuals who require help reducing complaints to writing. This includes listening to concerns and providing the **WIOA Title I Complaint/Grievance Form** which is attached to this policy in a format accessible to the individual. Reasonable accommodation and language assistance services must be provided when necessary.

Content of the Program Complaint/Grievance

Complaints must include the following:

- Name and contact information of complainant
- Name of respondent, if known
- Description of allegations
- Relevant dates
- Supporting documentation, if available
- Requested resolution

Complainants are encouraged to use the attached **WIOA Title I Complaint/Grievance Form** which provides sections for each of the require content areas.

Time Limit for Filing

Complaints must generally be filed within one (1) year of the alleged violation unless another law or regulation establishes a different filing period.

Complaint Coordinator

Advance Central PA designates the following individual to coordinate WIOA Title I complaints and grievances. Complainants must submit their complaint to this individual.

Marca O'Hargan
Compliance Monitor/EO Officer
Advance Central PA
130 Kelly Square, Suite 1
Lewisburg, PA 17837
570-568-6868
mohargan@advancecentralpa.org

Complaint/Grievance Filing Process Overview

1. Complainant Submittal of the Complaint

Complainant must submit their complaint/grievance to the Complaint Coordinator.

2. Informal Resolution

Within 10 working days of receiving the complaint, the Complaint Coordinator will review the complaint and may attempt informal resolution prior to a formal hearing. Informal resolution methods may include:

- Staff conferences
- Mediation
- Corrective actions
- Settlement discussions

If an informal resolution cannot be reached between the Respondent and Complainant, the Complaint Coordinator is responsible for forwarding the complaint to Advance Central PA's Policy & Performance Committee and notifying the complainant that this was completed. The Policy & Performance Committee will meet within 15 days to discuss the matter. This Committee will then issue its decision to the complainant within 5 working days of such meeting.

Note: Informal resolution efforts shall not delay the complainant's right to a hearing.

3. Right to a Hearing

If a complaint cannot be resolved informally, the complainant shall be provided an opportunity for a hearing. Therefore, if complainant is not satisfied with the decision of the Policy and Performance Committee, the complainant may submit a request for a hearing along with the reason for dissatisfaction with the decision of the Committee within 5 days.

4. Hearing Processes

Advance Central PA shall conduct a hearing when requested and issue a written decision within sixty (60) days of the filing of the complaint.

Hearings shall:

- Be conducted by impartial hearing officers, including a designated Workforce Development Board member
- Provide reasonable advance notice
- Allow both parties to present evidence
- Allow witness testimony
- Permit representative by counsel or another representative
- Maintain an official record of proceedings
- Result in written decision

5. Written Decision

Written determinations shall include:

- Summary of allegations

- Findings of fact
- Applicable laws or regulations
- Conclusions
- Corrective actions, if applicable
- Appeal rights and deadlines

Appeals Process

A request for a local level appeal (20 CFR 683.600(c)(4)) to the PA Department of Labor & Industry (L&I) can be made by either a complainant or a respondent not satisfied with the local area's hearing decision or when no local area decision was reached within 60 of the filing of the grievance or complaint.

Complainants are encouraged to use the attached **WIOA Title I Compliant/Grievance Appeal Form** which provides sections for each of the required content areas.

State hearings or appeals will be conducted in accordance with the Memorandum of Understanding for Independent Hearing Examiner Services between the L&I and the PA Department of State as well as regulatory provisions found at Title 20 CFR 683.600-620.

The designated Agency Liaison for the State Workforce Agency shall be L&I's Bureau of Workforce Partnership Customer Service Coordination Unit Supervisor. The Agency Liaison is responsible for coordinating activities with the appointed hearing examiner.

Grievances or complaints under 20 CFR 683.600, submitted directly to the US Department of Labor (USDOL), will be referred to the appropriate state or local area for resolution, unless USDOL notifies the parties involved that US DOL will investigate the submitted complaint or grievance.

Pursuant to 20 CFR 683.610(a) US DOL will investigate allegations arising through the grievance procedures found in 20 CFR 683.600 when:

1. A decision on a grievance or complaint under 20 CFR 683.600(d) [*i.e., State Procedures*] has not been reached within 60 days of receipt of the grievance or complaint or within 60 days of receipt of the request for appeal of a local level grievance and either party appeals to USDOL. Appeals made under either of these scenarios must be filed within 120 days of the filing of the grievance with the state, or the filing of the appeal of a local grievance with the state.
2. A decision on a grievance or complaint under § 683.600(d) [*i.e., State Procedures*] has been reached and the party to which such decision is adverse appeals to USDOL. Appeals made under this scenario must be filed within 60 days of the receipt of the decision being appealed.

Under the scenarios listed above USDOL must make a final decision on the filed appeal no later than 120 days after receiving the appeal. All appeals must be submitted by certified mail, return receipt requested, to:

Secretary
U.S. Department of Labor
200 Constitution Ave. NW

Washington, DC 20210
Attention: ASET

Confidentiality

Complaint information shall be maintained confidentially to the maximum extent permitted by law.

Retaliation Prohibited

No person may intimidate, threaten, coerce, discriminate against, or retaliate against any individual because they:

- Filed a complaint
- Participated in a complaint investigation
- Assisted in complaint processing
- Opposed unlawful practices

Complaint/Grievance Tracking and Record Retention

Tracking Procedures

All complaint records will be tracked by Advance Central PA using the WIOA Title I **Program Complaint Tracker** spreadsheet. The tracker includes complainant contact information and all relevant dates regarding complaint informal review, hearing, and appeal.

Record Retention

All complaint records shall be maintained for a minimum of three (3) years following final resolution unless a longer retention period is otherwise required by law.

Records shall include:

- Complaint forms
- Correspondence
- Investigation materials
- Hearing records
- Determinations
- Appeals
- Resolution documentation

Public Notice

Advance Central PA will:

- Publicly post complaint procedures
- Include complaint rights in participant materials
- Make procedures available upon request
- Ensure staff are trained regarding complaint procedures and rights

Fraud and Waste

Pursuant to 20 CFR 683.620, allegations of fraud, abuse, criminal misconduct, and misuse of WIOA funds may be referred to appropriate investigative authorities and handled separately from standard grievance procedures.

Attachment: WIOA Title I Compliant/Grievance Form

Complainant (person filing the complaint) Information	
Name	
Address	
Phone Number	
Email Address	
Participant ID (if applicable)	
Complaint Submittal	
Date Complaint Submitted	
Name of Respondent	Advance Central PA EO Officer
Description of Allegations	
Date(s) of Allegations	
Location of Allegations	
Name of Involved Person(s), WIOA Title I Program(s), Etc.	
Description of Allegations (Clearly describe your complaint and any relevant information about what happened.)	

Supporting Documentation (Clearly outline any supporting documentation you are including with this form.)	
Description of Requested Resolution	
Requested Resolution (Clearly describe what you would like to happen to resolve the complaint.)	

Attachment: WIOA Title I Compliant/Grievance Appeal Form

Complainant (person filing the complaint) Information	
Name	
Address	
Phone Number	
Email Address	
Participant ID (if applicable)	
Original Complaint Submittal	
Date Initial Complaint Submitted	
Date of Written Decision	
Description of Appeal	
Description of Reason for Appeal	
Supporting Documentation (Clearly outline any supporting documentation you are including with this form.)	
Description of Requested Resolution	
Requested Resolution (Clearly describe what you would like to happen to resolve the complaint.)	

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
June 2024	Annual review completed. No revisions were required.
June 2025	Annual review completed. No revisions were required.
July 2026	TBD

DRAFT



PA CareerLink® Code of Conduct Policy

Implemented July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded with federal dollars. For more information, visit: <https://advancecentralpa.org/about-us/public-notices/>

PA CareerLink® Code of Conduct Policy

Background

This policy is established to maintain a safe, welcoming, respectful, and professional environment for everyone at the PA CareerLink®, and applies to anyone who utilizes the PA CareerLink® including: job seekers and other individual customers, accompanying children/dependents, staff, and visiting businesses and community organizations.

General Conduct and Professionalism

The PA CareerLink® is a place of business where customers might be writing resumes, searching for jobs, participating in job coaching sessions with staff, interviewing with employers, or taking classes. To maintain a professional environment where everyone can effectively access the services they would like, standard expectations must be upheld by everyone on site.

- Treat others with respect, courtesy, and dignity.
- Do not initiate or engage in verbal abuse, swearing, intimidation, harassment, physical aggression, or disruptive behavior; these behaviors are unacceptable and will not be tolerated.

PA CareerLink® Computers and Equipment

Computers, phones, printers, and specialized equipment are available for appropriate and safe use. This includes usage related to: PA CareerLink® online account access and services, career exploration, skills training, job search, health and benefits monitoring, access to public and other community resources.

Supervision of Accompanying Children

Customers are responsible for the supervision and behavior of any children present with them at PA CareerLink®. Children may not use the PA CareerLink® computers, phones, printers, or other office equipment. PA CareerLink® staff are not permitted to watch children or otherwise be responsible for them.

Guidelines:

- Customers may not leave children unattended at any time.
- Customers must ensure children remain in designated areas of the site unless otherwise directed.
- Customers must be able to fully participate in planned activities and services.

Customers are responsible for ensuring that children:

- Use indoor voices.
- Do not engage in disruptive, unsafe, or inappropriate behavior.
- Do not run or engage in rough-housing.

- Respect staff, customers, equipment, and facility rules.
- Follow all posted signs and staff instructions.
- Do not interfere with program services or other participants.

Examples of disruptive behavior include (but is not limited to):

- Excessive noise, running, or unsafe activity.
- Interference with workshops, appointments, or computer use.
- Damage to property or equipment.
- Behavior that creates discomfort or safety concerns for others.

Customers who bring children on-site may provide entertainment as follows:

- Books are strongly encouraged. Remember, the library is a great resource! If you don't currently have a library card, PA CareerLink® staff will be happy to help you understand what to do.
- Coloring books and crayons and imaginative toys such as blocks, dolls, and figurines can be brought on-site for quiet play.
- Children are permitted to watch videos or play games on a phone or other device that the customer brings, but headphones must be used so they do not disturb other customers.
- The site may also have quiet toys and books for children. If interested, ask staff if there are toys or books available.

Workstations with infant mats:

- Some PA CareerLink® sites have workstations that allow customers to use a computer to access training activities while an infant or small toddler can rest or play quietly next to them. If interested, ask staff if there is workstation like this available.

Food and Drink

Customers may bring small non-messy snacks and drinks with secure lids.

Customers are responsible for cleaning up any wrappers, crumbs, spills, etc. and must ask for help if cleaning supplies are needed.

Alcohol and Other Drugs

The manufacturing, distribution, selling, possession, or use of alcohol or illegal drugs is prohibited while you are at the PA CareerLink® or engaging in remote activities, such as workshops. If you are having a problem with alcohol or drugs, speak with staff who may be able to help connect you to available resources in the community.

Staff Authority and Immediate Actions

If this policy is not being followed, PA CareerLink® staff have the authority to professionally address the part of the policy that is not being adhered to with the individual. If the non-compliance with this policy is not immediately resolved, staff may take the following actions:

- Pause, end, or reschedule an individual's appointment/activity
- Request that the individual step outside or leave the premises
- Schedule an appointment to discuss or re-evaluate barriers and remediation plans
- Contact law enforcement

Consequences/Impact on Participation

Individuals enrolled in specific PA CareerLink® programs may have additional expectations and those policies and/or handbooks should be consulted for more information. Overall, failure to meet the expectations outlined herein may result in:

- Loss of participation hours for that day
- Rescheduled or missed activities
- Termination of access to the PA CareerLink® in Central PA

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
7/2026	Implementation Date