Philadelphia Works Organizational Compliance Plan

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I. INTRODUCTION

A. Purpose of Compliance Plan. The purpose of the Philadelphia Works, Inc. (“Philadelphia Works”) Compliance Plan (“the Plan”) is to establish a governance goal that develops a consistent, efficient workforce development system that meets the needs of its stakeholders. Philadelphia Works is dedicated to managing its business operations in the most ethical and legal manner and expects its employees, board members, business partners and contractors to strictly follow the organization’s high moral standards. The Plan provides a comprehensive overview of Philadelphia Works’ ongoing compliance program and also highlights its policies, tools and instruments used to implement the Workforce Investment Act (“WIA”) and the Temporary Assistance for Needy Families (“TANF”) programs as well as its contractual obligations.

B. Background. Philadelphia Works’ initial efforts to develop its Compliance Plan (“the Plan”) involved research and outreach to the National Association of Workforce Investment Board (NWAB), as well as various governmental entities, including the U.S. Department of Labor, numerous state Workforce Investment Boards (WIBs) and several local Pennsylvania WIBs. This widespread research revealed that formal, comprehensive compliance plans did not exist in other state and local workforce development areas. As it was unable to rely upon other workforce compliance plans, Philadelphia Works was compelled to create a plan from inception. It gathered compliance plans from other nonprofit organizations and private highly regulated corporations, including hospitals, social service organizations and financial services institutions and thoroughly reviewed numerous legal articles regarding the crucial components and the development and implementation of a compliance program. Using this information, key areas and topics of the Plan were identified, outlined and presented to Philadelphia Works’ senior leadership team and its Board of Directors and a final Plan was created. Philadelphia Works is proud of its innovative and proactive approach to compliance and aspires to create a foundation for other WIBs to follow.

C. Statement of Compliance Program. Philadelphia Works is dedicated to the delivery of employment and training programs and services to employers and job-seekers in an environment characterized by strict conformity and accountability. It is fully committed to the development of a formal corporate compliance program to ensure ongoing monitoring and adherence to all legal and regulatory requirements. Philadelphia Works’ robust governance, backed by the strong oversight of its senior management team and Board of Directors, will serve to establish sound organizational structure and efficiencies.

D. Philadelphia Works’ Mission and Vision. Philadelphia Works connects employers to a skilled workforce and helps individuals develop the skills needed to thrive in the workplace. Philadelphia Works envisions a workforce system for the city of Philadelphia that will be among the most integrated, innovative, productive and transparent systems of its kind in the country:
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- Consistently delivering value for employers and job-seekers
- Contributing measurably to the economic growth of the region
- Serving as a model for others to learn and replicate

E. **Core Values.** Philadelphia Works is committed to the highest ethical principles. We expect our employees and board members to exhibit their ongoing commitment to our core values of integrity, performance and improvement, customer service, accountability, caring, candor, creativity, clarity, collaboration, consistency and courage. We are an organization that promotes an environment of open communication and cultivates working relationships that are based on mutual respect, fairness and honesty. Senior leadership takes a proactive approach to ethical issues and continually instills our core values to staff. Our goal is to convert these core values into behaviors rather than simply values alone.

II. **BOARD OF DIRECTORS AND ORGANIZATIONAL UNITS**

The organizational chart and job descriptions of Philadelphia Works illustrate a staffing structure sufficient to perform grant management functions and maintain compliance with programs. Each Philadelphia Works business unit and associated department operates with Philadelphia Works’ mission in mind and maintains policies and procedures for core management functions and program operations.

A. **Board of Directors**

1. **Key Functions.** The Mayor of Philadelphia, using a nomination process and criteria specified in WIA and the Commonwealth’s policies, is responsible for appointing the Board of Directors (“Board”) of Philadelphia Works. The Board promotes workforce initiatives, helps to build strategic partnerships and leverages resources necessary to move toward a world class system. Board members are expected to contribute to the development and approval of Philadelphia Works’ policies and its annual work plan. The Board is accountable to the Board chairman and the Mayor of Philadelphia.

2. **Compliance Obligations.**
   
   a. **Board Composition.** The by-laws governing Philadelphia Works, as well as specific WIA provisions, mandate composition of the Board. The majority of the Board (at least 51%) must consist of representatives from private sector businesses in the local area, with a mix from small, medium and large companies. There must also be representatives from local educational entities, organized labor, community-based organizations, economic development agencies and mandated one-stop partners.

   As board membership is particularly dynamic, it is crucial for Philadelphia Works to consistently manage membership changes in order to maintain compliance. Monitoring takes place on an ongoing basis, but is particularly significant when terms expire or members resign. When this occurs, Philadelphia Works engages in a strategic assessment and evaluation process with the Board Development Committee to
determine not only if reappointments are suitable, but to ascertain whether a shift in composition is appropriate or a change in current industry representation is necessary.

b. Appointment and Nomination Process. In addition to overseeing board composition, Philadelphia Works ensures that proper channels are followed regarding the nomination and appointment process. Philadelphia Works also maintains a prescribed procedure to confirm that all necessary paperwork is accurately completed by Board members in a timely manner. This task is accomplished through a formal quality review process overseen by the Compliance Officer. If required information is not submitted by the mandated deadline, the President and CEO, with input from the Board Development Committee, may seek appropriate action against the non-compliant Board member, which could include, but is not limited to, exclusion from future board meetings or removal from the Board, if appropriate.

c. Annual Local Workforce Investment Board Membership Review. The Commonwealth requires each Local Workforce Investment Board (“LWIB”) to submit current Board and local Youth Council membership lists to the Bureau of Workforce Partnership and Operations (“BWPO”) on an annual basis. In addition to the membership lists, Philadelphia Works must submit original documentation required for each Board member, which includes a completed Statement of Financial Interest form, a Nomination and Appointment letter and a Conflict of Interest form. All documentation is reviewed by BWPO for accuracy and completeness and subsequently issues a formal report to Philadelphia Works indicating whether the regulatory requirements are met.

d. Conflict of Interest Code. As appointed public officials, all Board members must agree in writing to abide by the Conflict of Interest Code (“Code”) established by Executive Order 2000-2. Members may not participate in any decision making or act in any capacity on behalf of the organization that may result in a personal gain or a financial benefit for himself or an immediate family member. Board members are required to recuse themselves from their duties if such a conflict exists or advise the Board of any potential conflicts. If there is any doubt that a specific conflict exists, he or she is required to request an opinion from the Board. After an investigation by the Board, it is determined that a violation of the Code existed, the Board member may be removed.

B. Human Resources

1. Key Functions. The key functions of the Human Resources Department are offering professional consultation to leadership and the organization, providing employees with training and development, inspiring and encouraging a high level of employee morale, establishing and administering sound policies, recruiting and hiring talent professionals and providing a safe work environment.

2. Compliance Obligations.

   a. Personnel Policies. Philadelphia Works is committed to fair and lawful human resource policies and practices. Each employee of the organization is furnished with a written Employee
Information Manual ("the Manual") on their first day of employment. The most current version is also posted on the organization’s internal website. Employees are expected to review, understand and abide by all provisions of the Manual. The Manual is designed to inform employees about Philadelphia Works, its principal policies and the benefits available to eligible employees. Personnel policies are contained within the Manual and include, but are not limited to, a Code of Ethics, a Compliance Code of Conduct, a Conflict of Interest Policy and a Workplace Violence Policy. Philadelphia Works encourages employees to report all violations or suspected violations of employment practices. The Director of Human Resources is designated by the CEO to receive and investigate all violations of employment practices, including those covered by Equal Employment Opportunity ("EEO") laws.

b. **Training.** Human Resources provides Philadelphia Works employees with training and development opportunities that will motivate employees to perform in the most effective and efficient manner. In-house training is conducted on a variety of topics ranging from sexual harassment to privacy laws every two to three years, or as required. In addition to general training, specific trainings, such as performance reviews and management skills, may be geared specifically toward managers. Human Resources also conducts an all-staff meeting approximately four times per year to advise employees of new initiatives, staff changes and system performance.

c. **Creating a Safe Work Environment.** Philadelphia Works is dedicated to protecting the safety, welfare and health of its employees. As such, it has established a joint staff and management safety committee, whose purpose is to prevent injury and illness due to hazards in the workplace. The committee meets monthly to discuss such topics as improvement of safety programs and conditions and outcomes and/or resolutions of issues identified in quarterly inspections. They also attend annual state certified safety training. As a result of these meetings, potential safety issues are identified and rectified before accidents occur and staff is more cognizant of the importance of maintaining a safe and healthy environment.

There are several safety policies in effect, including an *Evacuation Plan* and a *Shelter in Place Plan*, attached at Appendices A and B. These safety policies are periodically revised and new policies are created as required. In addition to the Safety Committee, the organization appointed Fire Wardens for each floor, whose responsibility is to guide staff and visitors in the event of evacuation and promote a continued safe environment.

d. **EEO and Non-Discrimination.** Philadelphia Works provides equal opportunity to all employees and applicants for employment without regard to race, color, gender, creed, age, national origin, ancestry, family status, religion, physical or mental disability, veteran status, sexual preference, or any other basis protected by federal, state or local laws. All employees and applicants are notified of this policy and new employees are given a copy upon employment. Employees are directed to bring all allegations of discrimination to the Human Resources Department in confidence. Philadelphia Works is legally bound to investigate and pursue allegations once they have been reported. If, after investigation,
it is determined that an employee engaged in discriminatory action, the employee may be subject to

discipline, up to and including termination.

C. Finance

1. Key Functions. The key functions of the Finance Unit involve execution of vendor contracts,
creation of budgets associated with contract agreements, payment of contract related invoices in
compliance with applicable regulations, tracking and reporting of revenue and expenses to the
Commonwealth, management of cash flow and financial monitoring and auditing of the workforce
system. The Technology and Supportive Services Department, which reports to the Finance Unit, is
responsible for providing internal support to the organization through administrative and technological
assistance, controlling external and internal communications and maintaining the integrity of
Philadelphia Works’ property, records and data systems.

2. Compliance Obligations.

   a. Internal Control. The Finance Unit of Philadelphia Works ensures that fiscal and
accounting procedures, including those of the WIA Title I contractor, other contractors and
subcontractors and training providers (collectively referred to as “Service Providers”) are sufficient to
provide effective internal control to safeguard assets and ensure proper use. Through annual
independent audits of Philadelphia Works and Service Providers and monitoring of internal fiscal
controls and procedures, strong protections have been established to ensure proper utilization of
awarded funds and resources.

      (1) Safeguarding Assets. Philadelphia Works requires its employees and Service
Providers to protect assets and ensure their efficient use. Theft, carelessness, and waste have a
direct impact on Philadelphia Works’ reputation and productivity. The Finance Unit verifies that
Philadelphia Works’ property is used for legitimate business purposes and in accordance with its
policies and procedures. Employees and Service Providers are expected to prevent
unauthorized use and abide by all regulations or contractual agreements governing their use.

      (2) Monitoring Business Expenses. Philadelphia Works reimburses its employees for
expenses incurred on official corporate business only if the expense was properly authorized,
reasonable, and appropriately documented. A formal Travel Policy, as well as a Business
Expense Policy, attached at Appendices C and D, set forth guidelines for business expenditures
and outline the process for reimbursement in order to meet Internal Revenue Service
regulations and other legal and contractual requirements.

   b. Financial Reports. The Finance Unit creates monthly financial reports that reflect actual
expenditures in comparison to budgeted amounts. The Service Providers’ monthly financial statements
are reviewed by the Finance team and compared with their approved budgets. Reimbursement invoices,
payment vouchers, receipts, as well as other supporting documentation and comprehensive reimbursement data, are required for payment approval and funds disbursement. These invoices and vouchers are verified for proper program cost allocation prior to approval for payment and disbursement of funds.

c. **Program Income.** Philadelphia Works reports program income on a monthly basis in its financial status reports. The Finance Unit tests and monitors Service Providers’ financial data and records to ensure proper reporting of program income.

d. **Cost Allocation.** The Finance Unit executes a Cost Allocation Plan to allocate Philadelphia Works’ costs. It also documents such costs in the expense ledger on an equitable basis across all grant awards, with all partners and/or programs sharing in the cost of the operation of Philadelphia Works.

D. **Research, Policy and Innovation**

1. **Key Functions.** The Research, Policy and Innovation Unit ("RP&I") tracks trends and compares outcomes for the Title I WIA provider, generates and validates data, defines metrics, produces summaries on system metrics and builds special reports as needed to reveal social and financial returns on investments. It also works with external groups to evaluate training programs and grant outcomes, manages pilot projects and discretionary grants, tests new resource sharing and aligns workforce funding and resources throughout the city.

2. **Compliance Obligations.**

   a. **Data Collection and Reporting Systems.** RP&I collects, validates and analyzes data and maintains reporting systems to fulfill external financial and programmatic reporting obligations. Philadelphia Works requires its Service Providers to use the Commonwealth’s reporting system and its central software system, which contains all required data elements to address local, state and federal programmatic reporting requirements, including performance information. The local software allows invoicing by funding stream.

   b. **Identification of Outcome Results.** RP&I identifies differences in records included in outcome results and resolves these with the Commonwealth to capture full financial reimbursements and performance outcomes.

   c. **Reporting.** RP&I creates monthly, quarterly and annual reports that delineate programmatic and fiscal performance by the system and by Service Provider, which are subsequently distributed to each Service Provider and the Board. RP&I also reviews and evaluates reports to ensure appropriate use of the data entry system and that proper accountability and oversight measures are in place for federal, state and local compliance requirements.
E. Workforce Delivery Service - Operations

1. Key Functions. The Operations Unit provides oversight on service delivery to both employers and jobseekers. Customized services available to employers include wage subsidization, job training and retraining and organizing business specific job fairs. Philadelphia Works contracts with Service Providers to deliver needs-based services to job seekers through direct job placement, skills assessment, counseling, career planning and case management.

   a. Employer Services. The Business Engagement and Industry Partnerships Departments are the two areas within the Operations Unit that focus primarily on employer support. These departments engage in face to face interaction with employer communities, ascertain employer needs and facilitate service delivery. They also deploy multi-faceted approaches to assist in placing job seekers and seek appropriate funding for programs.

   b. Employee Services. The Workforce Strategies Department within the Operations Unit focuses primarily on job seeker support for adults, dislocated workers and youth. This department provides strategic and technical assistance and training for contracted service delivery for various providers. The Department also conducts programmatic and compliance monitoring in accordance with funding guidelines and regulations. There are three program areas within this Department:

      (1) EARN Centers. There are currently six neighborhood based Employment Advancement Retention and Network (“EARN”) Centers that provide services to job seekers who receive welfare benefits in Philadelphia County. Job seekers are referred directly from the local County Assistance Offices.

      (2) PA CareerLink®. There are currently four neighborhood based PA CareerLink® centers that provide services to adult and dislocated workers. Job seekers may access the system in person or through an internet based website.

      (3) Youth. Programs for youth are administered through an operator intermediary, Philadelphia Youth Network (“PYN”), which provides direct services and contracts with numerous providers to deliver services to youth aged 14-17 and 18-24. Such services include preparing youth for economic education and success and articulating prevention of these future adults to access the welfare system.

2. Compliance Obligations.

   a. Programmatic. Philadelphia Works uses an integrated approach to provide services to job seekers and employers in a seamless service delivery system and coordinates its service delivery with other workforce agencies to provide integrated services to participants. Participants have full access to wide array of workforce partner services. Employer services are integrated to minimize duplicative employer contact and maximize access to employment information.
Philadelphia Works must review participant files and case notes to confirm that participants are receiving appropriate and effective services. Through its Service Providers, it develops individual service plans that meet the precise needs of each specific participant. Supportive services are used to overcome barriers to employment and participants may also receive training as needed as they progress towards their employment goals.

b. **Performance.** Philadelphia Works’ contract and subcontract agreements contain clear, specific and measurable performance goals, where applicable. It holds Service Providers accountable for actual versus planned accomplishments related to performance goals.

Philadelphia Works is committed to compliance with both state and federal regulations and policies. It develops local performance measures and generates reports detailing each Service Provider’s performance. When Service Providers fall below established performance measures, Philadelphia Works offers technical assistance and guidance to correct the specified findings and assists with improvement of their performance. If the Service Providers still do not achieve established performance measures after receiving technical assistance and detailed corrective action guidance, Philadelphia Works may recommend appropriate sanctions.

### III. COMPLIANCE PLAN REQUIREMENTS

**A. Standards of Professional Conduct for Philadelphia Works’ Staff**

Employees are expected to follow the standards set forth in the Plan and all applicable policies and procedures. In addition, employees shall:

- Maintain a professional attitude and conduct business and personal activities with the highest level of integrity.
- Never discriminate against or refuse professional services to anyone on the basis of race, color, gender, creed, age, national origin, ancestry, family status, religion, physical or mental disability, veteran status, sexual preference, or any other basis protected by federal, state or local laws.
- Report violations or suspected violations of personnel policies or compliance matters.
- Respect the privacy of persons served and hold in confidence all information obtained in the course of professional service.
- Respect the rights and views of their colleagues.
- Have total commitment to provide the highest quality of service to those who seek their professional assistance.
- Continually assess their personal strengths, limitations and effectiveness.
- Seek assistance for any problem that impairs their performance.
B. Non-Discrimination and Equitable Handling of Complaints

1. **Equal Opportunity.** It is the policy of Philadelphia Works to provide equal opportunity to not only its employees, but to all participants and Service Providers. No person shall, on the basis of race, color, gender, creed, age, national origin, ancestry, family status, religion, physical or mental disability, veteran status, sexual preference, or any other basis protected by federal, state or local laws, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination in any Philadelphia Works activity or program. All potential Service Providers and participants are notified of this policy. Participants are notified through the “Equal Opportunity is the Law” posters that are displayed at all Philadelphia Works’ Service Provider facilities. Service Providers are notified through statements in contracts and Memoranda of Understanding.

2. **Impartial Grievance Process.** It is the intent of Philadelphia Works to foster a positive and supportive work environment and to administer the programs that it funds in an impartial and non-discriminatory manner. As such, Philadelphia Works implemented several grievance procedures for partner employers, staff, contractors and training providers if they believe that they have been treated in an unfair manner. For allegations involving a civil rights violation, harassment or discrimination, Philadelphia Works directs the complainant to file with the Commonwealth’s Labor and Industry Department and/or the United States Department of Labor.

   a. **Grievance Procedures for Participants.** Philadelphia Works instituted a grievance procedure for any participant who believes they were treated unfairly or alleges that their rights were violated by a Philadelphia Works’ Service Provider. The participant is encouraged to complete and submit a “Client Grievance Form” to Philadelphia Works, who investigates and makes a final determination pertaining to the course of action of the dispute no later than forty-five (45) days after the grievance filing date. See *Philadelphia Works Grievance Procedure for Participants*, attached at Appendix E.

   b. **Grievance and Complaint Procedures for PA CareerLink® Staff.** In addition to its own staff grievance policy, discussed in Section II.B of this Plan, Philadelphia Works follows a *Grievance and Complaint Procedure for PA CareerLink®* partner staff members, attached at Appendix F. PA CareerLink® partner employees are first required to follow their respective employer’s current grievance and appeal policy particularly as it pertains to intra-agency issues. However, in the event that an inter-agency grievance arises or the employee is not satisfied with their employer’s resolution of the matter, the staff member may engage in a three-step process, which begins with an informal discussion with the PA CareerLink® administrator, followed by a written complaint filed with Philadelphia Works and finally, a written appeal, if necessary. Philadelphia Works responds to all allegations and investigates the concerns in a timely manner.
c. **Appeal Procedures for Training Providers.** Philadelphia Works allows potential or current contractors, subcontractors, and training providers to document concerns and offer evidence to support a request for reconsideration of a funding, procurement, or eligibility decision through its *Contractor Appeal Policy*, attached at *Appendix G*. Philadelphia Works reviews all documentation, coordinates an appeal meeting with the complainant, and renders an impartial decision within fifteen (15) business days from the date of the notice of appeal.

### C. **Integrity of Business Records**

1. **Retention of Records.** Every Philadelphia Works employee is responsible for the integrity and accuracy of Philadelphia Works’ documents and records in order to comply with regulatory and legal requirements. Records should be stored and retained in a manner that preserves their integrity and admissibility of evidence in any audit or other proceeding or to defend business practices and actions. Therefore, Philadelphia Works maintains a *Record Retention Policy*, attached at *Appendix H*, which directs all grant and agreement records to be retained for five years and property records to be retained for three years. Records are retained beyond the prescribed periods if any litigation, investigation or audit begins or if a claim is instituted involving a grant or agreement covered by the records. In these instances, records will be retained until the litigation, audit, or claim has been resolved. Staff members are prohibited from removing or destroying these documents prior to the specified destruction date.

   Philadelphia Works ensures that all Service Providers include record retention procedures in their contractual agreements. In the event of termination of the relationship with a Service Provider, Philadelphia Works is responsible for the maintenance and retention of the Service Provider’s records for those unable to retain them.

   a. **Service Provider Archiving Process.** Philadelphia Works requires Service Providers to follow a standard archiving process to store participant files off-site for the necessary time period. See *Philadelphia Works’ Archiving Procedures*, attached at *Appendix I*. Service Providers must archive files through Philadelphia Works’ current archiving vendor and must use a uniform spreadsheet developed by Philadelphia Works to create consistency and convenience in the retrieval process. The retention information is maintained by the Service Provider, Philadelphia Works, and the vendor so that files can be easily accessed and uniformly destroyed pursuant to the Philadelphia Works Record Retention Policy.

2. **Accuracy of Records.** Philadelphia Works requires honest and accurate recording and reporting of information in order to make responsible business decisions. This includes research data, Service Provider records, personnel records, and financial books and records. All records must accurately reflect transactions and events and conform to company policy and applicable law. No person shall tamper with, alter, or falsify information on any Philadelphia Works’ record or document.

3. **Confidentiality of Records.** Philadelphia Works fully respects the rights of all participants served, including their right to privacy. It will hold information concerning its participants in the strictest of
confidence. Such information will be not disclosed to anyone unless authorized by the participant or otherwise required by law. Philadelphia Works complies with all confidentiality laws, including but not limited to, the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and other state and federal privacy regulations.

Philadelphia Works staff will not disclose information that compromises the security, confidentiality, or integrity of sensitive data. No employee or former employee, without consent of Philadelphia Works, will use for their own benefit or disclose any confidential information obtained during the course of their employment. A copy of Philadelphia Works’ Privacy and Confidentiality Policy is attached at Appendix J.

Philadelphia Works administers an Electronic Systems Access and Deactivation Policy, attached at Appendix K, in order to protect the integrity and security of the various internal and external information systems utilized by Philadelphia Works and its Service Providers. The purpose of the policy is to ensure that confidential data stored on the various information systems is only accessible by authorized users. Philadelphia Works will also conduct periodic monitoring of this Policy and the procedures of its Service Providers and carry out several security measures to safeguard against noncompliance.

4. Right-to-Know Policy. Philadelphia Works abides by Pennsylvania’s Right-to-Know Law, which provides citizens the right of access to public records. Philadelphia Works has its own Right-to-Know Policy for handling requests for access to public records, which is attached at Appendix L. This policy directs citizens on how to submit a request for a public record and outlines fees associated with such a request. Philadelphia Works appointed the Compliance Officer as the Open Records Officer, who is responsible for responding to all requests within the mandated deadline and providing reasonable grounds for a denial, if appropriate.

D. Designation of a Compliance Officer

The CEO of Philadelphia Works appointed a Compliance Officer to ensure an effective compliance program. The Compliance Officer will oversee the organization’s compliance program and provide periodic and regular reports to the CEO and Board on matters pertaining to the program. The Compliance Officer serves as the organization’s primary point of contact for organizational compliance issues, develops, implements and monitors, on a regular and consistent basis, the organization’s compliance plan, including internal and external monitoring and audits, and coordinates the development of the organization’s formal compliance program. The Compliance Officer also keeps current with laws, regulations and policies applicable to compliance in order to provide the best possible advice and guidance to the organization.
E. **Conducting Successful Training**

1. **General and Targeted Training.** Philadelphia Works strives to effectively deliver appropriate education and assist employees in understanding their role in the compliance program. Training is designed to educate Philadelphia Works personnel about their obligation to follow the law and encourage immediate notification of any possible ethical breaches.

All Philadelphia Works employees will participate in mandatory general compliance training and education of the Plan. Training will also be made part of the orientation for new employees. An employee’s failure to participate may result in disciplinary action up to and including termination. In addition to general compliance training and education, targeted training that is tailored to specific individuals or departments and identified risk areas may also be offered. This mandatory training may include sessions summarizing changes to WIA and TANF regulations and variances in contractual requirements.

2. **Distribution of Compliance Information.** In addition to periodic training, the Compliance Officer will distribute any relevant new compliance information to affected employees. Such information may include legislative notifications, advisory opinions, newsletters, bulletins, and email alerts.

F. **Developing Effective Lines of Communication**

1. **Access to the Compliance Officer.** The Compliance Officer maintains an open-door policy and will be available to provide guidance to any Philadelphia Works employee who requires assistance in determining compliance issues and conduct. The Compliance Officer is the lead representative in preserving the ethical and legal stance of the organization. As an advocate of compliance related issues and conduct, he or she works and communicates closely with the chain of command to ensure that the organization is operating within state and federal guidelines.

2. **Distribution of Plan.** This Plan will be made accessible to employees and to the public through the Philadelphia Works website. Current employees are required to examine the Plan within 60 days of receipt and new employees must certify their receipt and examination of the Plan within 60 days after their commencement date.

3. **Changes to the Plan.** Any changes to the Plan will be promptly announced and routed through staff through email communication and updated on the organization’s website.

G. **Responding to Detected Offenses and Developing Corrective Action**

1. **Enforcing Standards and Investigating Violations.** When notification of a potential violation of the Plan is received, the Compliance Officer conducts an investigation to determine whether misconduct actually exists. If so, and the individual(s) involved is not a Philadelphia Works employee, the Compliance Officer forwards his or her findings to the CEO and the Board, if appropriate, for a resolution.
If the individual(s) involved is a Philadelphia Works employee, then a determination of the type of misconduct should be made. If it is determined after investigation that non-compliant conduct occurred because of negligence or inadvertence, the matter will be handled by the appropriate supervisor, who will inform the Compliance Officer of the offense and the corrective action taken. If it is determined after investigation that non-compliant conduct occurred as a result of willful and knowing action or gross negligence, then the matter will be referred to the Compliance Officer and Human Resources to determine appropriate corrective action in light of all available information.

2. **Corrective Actions.** Appropriate corrective action measures shall be determined on a case-by-case basis. Disciplinary action, if required, will be managed in accordance with the Employee Manual.

3. **Whistleblower Policy.** Philadelphia Works adheres to its Whistleblower Policy, which establishes procedures for the submission of concerns regarding questionable or improper accounting or auditing practices or any other violation of the Code of Ethics. The objectives of the Whistleblower Policy are to encourage the reporting of such concerns, maintain confidentiality, if requested, outline Philadelphia Works’ treatment of such concerns and protect employees and board members who report such concerns from retaliatory actions. A copy of the *Whistleblower Policy* is attached at *Appendix M.*

H. **Auditing and Monitoring**

1. **WIA Monitoring Requirements.** The monitoring process, as required by 20 CFR Part 667.410(a) of WIA states as follows:

   “Each recipient and sub-recipient must conduct regular oversight and monitoring of its WIA activities and those of its sub-recipient in order to:

   1. Determine that expenditures have been made against the cost categories and within cost limitations specified in the Act;
   2. Determine whether or not there is compliance with other provisions of the Act;
   3. Provide technical assistance as necessary.”

2. **Internal Monitoring Overview.** Philadelphia Works is responsible for the oversight and governance of Philadelphia’s workforce system and confirms that the system is in compliance with WIA. To accomplish this task, Philadelphia Works monitors each Service Provider to ensure compliance with funding regulations and adherence to contracts. Program and fiscal monitoring take place formally through site visits and informally through meetings and desk reviews and provide an opportunity to offer technical assistance and develop interventions required to improve performance. Monitoring is conducted annually and throughout the year.

   Philadelphia Works utilizes written monitoring tools and procedures to monitor all elements of grants against performance objectives and uniform administrative requirements. These tools and procedures
allow Philadelphia Works to verify compliance with federal program laws and grant agreements and confirm that performance goals are achieved. Monitoring tools and procedures are updated as necessary to accomplish effective and efficient reviews.

Should a deficiency be discovered, and such a deficiency has a material impact on a program, as determined by senior management, Philadelphia Works requires the Service Provider to follow a corrective action plan. Philadelphia Works subsequently conducts a follow-up review with the Service Provider to verify that the steps detailed in the corrective action plan are properly implemented.

3. **Internal Program and Compliance Monitoring.** Philadelphia Works conducts extensive oversight and monitoring of its Service Providers, including its WIA Title I Provider and the four neighborhood PA CareerLink® Centers; the facilities that provide services supported by TANF funds, which include six neighborhood EARN Centers and various JSST training providers; and its Youth Operator. Internal monitoring involves verification of eligibility and required performance measures. Failure to meet performance measures may result in additional monitoring visits or corrective action plans that require program model changes. Continued failure to meet performance measures may result in contract cancellation and ineligibility of further contract awards.

   a. **EARN Centers and JSST’s – Adults.**

   (1) **File Review Audit.** On a monthly basis, Philadelphia Works Program Representatives review approximately 50 files per EARN Center to verify that each center accurately monitored its own files in compliance with federal and state requirements. Monitoring consists of a review of pre-placement, employed and retention records for the target month; verification of time, attendance and employment hours; and confirmation that retention measures were met.

   (2) **Case Note Audit.** On a monthly basis, Program Representatives monitor approximately 55 pre-placement, employed and terminated file case notes from each EARN Center to validate that key issues were addressed and that notes were timely entered into the case management system.

   (3) **Full File Review.** Program Representatives perform a full year-end review of approximately 50 files per EARN Center. All aspects of the files from a targeted month are examined, including, but not limited to, time and attendance, required signatures, case notes, essential contacts, claimed job placement verification and six month job retention, if applicable.

   (4) **Training.** Philadelphia Works trainers offer training sessions to EARN service representatives and site administrators approximately 5 to 8 times per month. Training consists of technical instruction, professional development skills, such as
customer service and conflict management and compliance education, such as privacy requirements, case management updates and data entry.

b. **WIA Title I Provider - Adults & Dislocated Workers.**

   (1) **Programmatic, Performance and Compliance Monitoring.** On a monthly basis, Program Representatives conduct programmatic, performance and compliance monitoring of Philadelphia Works’ WIA Title I provider, which provides services supported by WIA Title I funds. This may include an on-site participant file review that encompasses the following areas: enrollment; eligibility; core services and Individual Employment Plans (“IEPs”); training; supportive services; case notes; exits; placements; and follow-up services.

   (2) **PA CareerLink® Delivery System and Operator Review.** Annual compliance monitoring of the entire PA CareerLink® delivery system is performed to ensure compliance with federal, state and local workforce policy. The review consists of a thorough assessment of the system’s legal documents, such as Resource Sharing Agreements, Memoranda of Understanding and Operator Consortium Agreements and examination of Americans with Disabilities Act (“ADA”) and EEO requirements, customer satisfaction surveys and progression of services process.

   (3) **Technical Assistance.** As needed, Philadelphia Works provides technical assistance to build capacity of PA CareerLink® staff to deliver services on a variety of technical issues and policy matters.

c. **Youth - TANF and WIA Funding.** All youth programs are monitored by the Youth Operator throughout the fiscal year in a myriad of ways, such as through semi-annual program site visits from program officers and quarterly file reviews led by performance management staff. In addition to the Youth Operator’s monitoring, Philadelphia Works' Manager of Youth Programs or an appropriate designee also evaluates the specific program models supported by WIA and TANF funds that are implemented by numerous youth service providers throughout Philadelphia.

   (1) **Program File Review.** Philadelphia Works performs an annual assessment of the Youth Operator’s program monitoring from the previous year. This examination consists of a random selection of subcontractor program files, including a site visit schedule, completed site visit forms and youth surveys. These forms are used to verify scheduled completion dates, follow-up regarding identified issues and compliance with state and federal regulations.

   (2) **Compliance & Monitoring Review.** Philadelphia Works conducts a broad annual review of the Youth Operator, which includes a detailed interview with management and executive teams, as well as a comprehensive analysis of the Youth Operator’s policies and
procedures with a focus on compliance and consistency. Philadelphia Works also evaluates the progress of new initiatives or points of interest communicated by the federal or state government.

(3) **Youth Participant File Review.** Philadelphia Works conducts an on-site eligibility review on a monthly basis, involving verification of eligibility and confirmation of proper enrollment and supporting documents. The total number of files that are reviewed is based on an overall percentage of youth served during the year.

(4) **Data Validation.** A quarterly review of vendor data entry is reviewed by Philadelphia Works to determine accuracy. During this examination, Philadelphia Works assesses the Youth Operator’s bi-monthly data validation of its vendor and analyzes eligibility, services and outcomes.

(5) **Informational Site Visits.** Throughout the year, Philadelphia Works participates in two informational site visits for each program model. This provides staff with the opportunity to observe the program in operation and allows questions to be asked about Philadelphia’s overall workforce system. These visits are made in addition to the Youth Operator’s visits throughout the year.

4. **Internal Fiscal Monitoring.** Philadelphia Works conducts oversight and fiscal monitoring of Service Providers that oversee federally funded training programs. The purpose of the review is to monitor compliance with all federal, state and local laws and all provisions of the contracts. The examination also verifies that adequate support documentation exists and costs are directly linked to program activities. In the event that disallowed costs are discovered or costs are not properly supported by documentation, future reimbursement will be offset by the respective amounts or a return of funds will be requested. The Service Provider will be promptly notified of any deficiency and provided with the rationale for the disallowances.

   a. **EARN Centers and JSST’s – Adults.** Fiscal auditing of the EARN Centers and JSST providers is conducted monthly, quarterly and annually by various members of Philadelphia Works’ Finance team.

      (1) **Monthly Audits.** A monthly fiscal audit is performed by Benchmark Analysts, who validate performance-based payment reconciliations of: On the Job Training (“OJT”) programs; Individual Training Accounts (“ITAs”); and Customized Job Training (“CJT”) contracts. They also gather and authenticate documentation to validate performance prior to submitting the financial data to the Commonwealth.

      (2) **Annual Audit.** The Benchmark and Financial Analysts conduct a comprehensive
examination on an annual basis of all EARN Centers and JSST providers. The monitoring involves a review of EEO and grievances procedures, invoices, budget and allocations, Circular A-133 audit and findings, procurement and equipment issues and performance goals.

(3) Quarterly Review. A quarterly fiscal review of the various agencies who receive TANF funds is performed by an Internal Auditor in the Finance Department. During this review, organizational policies, insurance certificates, inventory lists and internal controls are inspected. Additionally, the Internal Auditor reviews the general ledger and performs a comparison to the budget, verifies that administrative costs are not excessive and assesses the risk of material misrepresentation.

b. WIA Title I Contractor - Adults & Dislocated Workers. Benchmark and Financial Analysts conduct a comprehensive fiscal audit of Philadelphia Works’ WIA Title I contractor on an annual basis to ensure compliance with regulations and contractual provisions. Monitoring consists of EEO and grievances procedure review, inspection of invoices, review of budget and allocations, Circular A-133 audit and findings, procurement and equipment issues and measurement of performance goals. The examination also verifies that adequate support documentation exists, costs are directly linked to program activities, internal controls are in place and cost allocations are proper.

c. Youth. Philadelphia Works conducts a fiscal review of the various youth systems contracted through the Youth Operator and supported by TANF and WIA funds.

(1) TANF Payment Testing. Financial Analysts conduct on-site payment testing of the Youth Operator on a quarterly basis, which includes a full scale review of Philadelphia Works’ payments for TANF-funded program cost reimbursement, youth wages and the citywide Summer Jobs Program.

(2) WIA Payment Testing. Benchmark Analysts perform on-site payment testing of the Youth Operator on a quarterly basis that involves a review of the Youth Operator’s payments to its subcontractors for services. This testing is incorporated as part of the annual programmatic review.

(3) Fiscal Compliance Review. An annual comprehensive review of the Youth Operator’s fiscal monitoring of its contractors is executed by the Financial Analysts.

5. Discretionary Grant Monitoring and Oversight. In addition to the formula-funded awards that Philadelphia Works receives from the federal and state government, the U.S. Department of Labor (“US DOL”) occasionally awards discretionary grants, either directly, or through a national intermediary, in order to further a specific goal of the workforce development system.
Philadelphia Works may be awarded a discretionary grant as either a direct grantee or a sub-grantee. If Philadelphia Works is awarded such a grant and subsequently makes a sub-award to another entity to deliver grant services, it is responsible for monitoring the sub-grantee(s). It must assess compliance with programmatic, administrative and fiscal requirements in accordance with US DOL policies and the contractual provisions of the primary grant award. Monitoring of sub-grantees is conducted on-site at the sub-grantee location at least once during the grant term.

a. **Program Monitoring**: This compliance appraisal consists of desk reviews, entrance and exit interviews with the sub-grantee, file records examinations and interviews with project staff. It focuses on participant eligibility, documentation of individual services and outcomes and verification of civil rights, ADA, and complaint and grievance procedures. At the conclusion of monitoring, Philadelphia Works issues a written report documenting any findings, deficiencies or recommendations and a timeline is included for a response and/or corrective action, if necessary.

b. **Financial, Procurement and Administrative Monitoring**. This aspect of monitoring focuses on procurement and contracting, audit compliance, cost limitations and program income. Monitoring may also focus on additional areas depending on the nature of the grant purpose, funding source or contract terms. At the conclusion of monitoring, Philadelphia Works issues a written report documenting any findings, deficiencies or recommendations and a timeline is included for response and/or corrective action, if necessary.

c. **Review of Program Expenses**. Program expenses are assessed to include a monthly invoice review and approval process as well as a comparison of the quarterly budget versus actual expenses to ascertain any significant variances.

d. **Review of Program Activities and Outcomes**. In addition to monitoring, Philadelphia Works conducts oversight of the discretionary workforce program by providing technical assistance and resources as required by grantor or the US DOL, assure that the activities and outcomes of the program correspond with the statement of work and grant purpose and supply progress narratives, financial reports and participant data reports as requested.

6. **External Monitoring and Regulatory Contact Overview and Requirements**

a. **External Monitoring Requirements**. Philadelphia Works is subject to monitoring and auditing by both the state and federal government, which are responsible for the oversight of Philadelphia Works’ programmatic and fiscal compliance with WIA and TANF.

(1) **WIA – Adults and Dislocated Worker and Youth**

(a) **Commonwealth Compliance & Oversight System Analysis**. Philadelphia Works cooperates in the Commonwealth’s “Compliance and Oversight System Analysis,” a desk audit of the previous program year that takes place every November. The Commonwealth verifies that Philadelphia Works and its Service Providers are in
compliance with contractual requirements and reviews such areas as: local board compliance; service delivery standards; compliance with operator agreements and One Stop Partner agreements; eligibility; performance measures; and the validity of Philadelphia Works’ monitoring tools.

(b) **Commonwealth Data Validation.** Philadelphia Works collaborates with the Commonwealth for its annual on-site Data Validation Review. During this audit, performed in approximately December of each year, the state reviewer verifies that the Commonwealth Workforce Development System (“CWDS”) matches the records in possession of Philadelphia Works’ Service Providers.

(c) **Commonwealth Uniform Administration Requirement Analysis.** Philadelphia Works is reviewed by the Commonwealth for its annual on-site “Uniform Administration Requirement Analysis,” an assessment of Philadelphia Works’ fiscal and procurement systems from the previous program year. The Commonwealth analyzes the following areas: Request for Proposal (“RFP”) and vendor processes; inventory lists; financial reporting; accounting policies and procedures; time studies; program income; and internal controls.

(d) **Federal Monitoring.** Philadelphia Works cooperates with the United States Department of Labor Employment and Training Administration (“ETA”), which periodically conducts both fiscal and programmatic monitoring of its operations. The fiscal aspect of the review assesses procurement policies, funding allocations and monitoring tools while the programmatic review may involve a review of eligibility, EEO practices, participant exits, Training Provider performance and data validation.

(2) **TANF – Adult and Youth**

(a) **Commonwealth Desk Audit.** Philadelphia Works interacts with the Commonwealth during its monthly desk audits, which consists of an assessment of random TANF client files. This payment validation review confirms referrals and enrollments, service plan completions, attendance and activities, durational time limits, employment information, terminations, narratives and incentives and data entry.

(3) **Independent Fiscal Audit.** A fiscal desk audit of Philadelphia Works’ current financial status is performed annually in December by an independent auditing firm as required pursuant to OMB Circular A-133. The purpose of the audit is to ensure the effectiveness of the organization’s internal controls. The independent auditors review the financial position of Philadelphia Works, related statements of activities and changes in net assets, cash flows and functional expenses. The auditors are required to express their opinion on the financial statements and provide a detailed report, which must be provided to the Commonwealth by no later than March 31st of each year.
b. **Improper Influence on Conduct of Audits**: No representative of Philadelphia Works shall directly or indirectly take any action to coerce, mislead or fraudulently influence any public official or auditor engaged in the performance of an audit or monitoring review if that person knows or should know that such action, if successful, could result in the presentation of materially misleading programmatic or financial information. Philadelphia Works employees who believe such improper influence is being exerted should immediately contact the Compliance Officer to report such actions, who will take prompt action to investigate the allegations.

c. **Regulatory Inquiries**: If contacted by a regulator from a government entity, Philadelphia Works employees should first contact their supervisor and/or the Compliance Officer, who will attempt to obtain additional information from the official when determining how to respond to the request.

**IV. COMPLIANCE PLAN EFFECTIVENESS**

**A. Self-Monitoring and Annual Assessment of Compliance Plan**

On an annual basis, the Compliance Officer will measure the effectiveness of Philadelphia Works’ Compliance Plan. Using the **Annual Self-Assessment**, set forth at **Appendix N**, the required elements of the Compliance Plan will be examined. The Self-Assessment involves an evaluation of the overall success of the program and helps identify any weaknesses in Philadelphia Works’ current compliance program in order to implement appropriate changes. The Compliance Officer will report the results of the review to the President and CEO and, if appropriate, recommend changes in standards and procedures.

**B. Ongoing Testing through Departmental Compliance Evaluations**

Ongoing testing and evaluation is essential for the effectiveness of the Compliance Plan. Accordingly, the Compliance Officer will periodically test conformity to the applicable standards and procedures throughout the organization. Business units and departments within the organization will be randomly selected by the Compliance Officer to undergo a **Departmental Compliance Evaluation**, set forth at **Appendix O**. This evaluation is designed to examine the practices of Philadelphia Works’ business units and departments that pose risk of noncompliance. In response to any instances of noncompliance, the Compliance Officer will develop a corrective action plan to remedy any deficiencies identified in the results and provide the corrective action plan to those individuals who will be charged with the responsibility of implementing it. The Compliance Officer will report the results of the testing procedures to the President and CEO and summarize the recommended changes.

**C. Continued Compliance with Emerging Regulatory Requirements**

The Compliance Officer will regularly review the overall Compliance Plan, as well as all policies and procedures of Philadelphia Works, and make revisions if necessary. The evaluation will consider both the current state of the law, taking into account any new regulations or changes to existing laws, and the
completeness of the policies and procedures. If the Compliance Officer determines that they are ineffective or outdated, the documents will be updated to reflect any necessary changes.

Any changes to the policies or the Plan will be promptly announced and routed to staff through either a team meeting or email communication. In addition, the Compliance Officer will be responsible for initiating appropriate training for all employees affected by the changes and updates, if required.

V. RISK MANAGEMENT

A. Purpose

Risk is the possibility of suffering a negative impact to the organization, whether it is a regulatory sanction, decreased quality of services, increased costs, delayed completion dates or low performance. Philadelphia Works will sustain a risk management plan for identifying, mitigating and handling uncommon causes of risk.

B. Identification of Risk Areas

The risk areas set forth in below have been identified by Philadelphia Works as medium and high risk areas of focus for the organization’s compliance efforts. These risks represent a starting point for these efforts and more areas will be identified over time. Many of the detailed standards and policies for complying with federal, state and local laws implicated by these risk areas are contained in Philadelphia Works’ Employee Manual or in the policies attached to this Plan.

1. Financial Risks:
   a. Payment of invoices for services not covered under the grant award and/or without proper documentation required for grant award
   b. Improper verification of cost allocation prior to payment and disbursement of funds
   c. Inadequate resolution of overpayments and/or underpayments
   d. Failure to implement or properly follow fiscal controls
   e. Incorrect accounting of program income
   f. Inappropriate use of administrative expenses, including violations of business expense policies

2. Monitoring and Auditing Risks:
   a. Inaccurate or untimely responses to governmental inquiries
   b. Incorrectly and/or untimely fulfilling of external fiscal and programmatic reporting obligations
   c. Improper accountability and oversight measures implemented for compliance requirements
d. Insufficient implementation of corrective action regarding operational inaccuracies

3. **Human Resource Risks:**
   a. Failure to investigate an allegation of a violation of an employment policy
   b. Creation of unsafe work environment or failure to report accidents and injuries
   c. Employees dealt with inconsistently and/or in a discriminatory manner
   d. Retaliation against employees for reporting potential violations of personnel policies
   e. Allowing or otherwise condoning conduct that creates an actual or potential conflict of interest

4. **Programmatic Risks:**
   a. Participants receive inappropriate or ineffective services
   b. Performance goals are not clear, specific and/or measurable
   c. Actual performance goals do not meet targeted performance goals
   d. Poor or no technical assistance for improvement of subcontractor performance goals

5. **Business Record and Assets Risks:**
   a. Failure to maintain confidentiality of information/records
   b. Lack of integrity in computer systems
   c. Destruction of records without proper authority
   d. Poor safeguards of Philadelphia Works’ property resulting in damage, loss, misuse or theft

C. **Risk Analysis**

Philadelphia Works assesses the organization’s risks to determine the probability that the risk will occur and the impact of the risk if it does occur. Once the appropriate impact and probability are selected, it can prioritize the risks during the risk monitoring and control process.

1. **Risk Probability**

Philadelphia Works will assess the potential likelihood that a given risk will occur and will select an appropriate risk probability. Risk probabilities are defined as:

- High - Risk event more likely than not to occur
- Medium - Risk event may or may not occur
- Low - Risk event less likely than not to occur
2. **Risk Impact**

The risk impact describes the effects or consequences Philadelphia Works will experience if the risk event occurs. The impact may result in financial loss, regulatory sanctions, delay, reputational loss, strained relationships with clients or vendors, injury to people, etc. Risk impact is categorized as:

- **High** - Risk has potential to greatly impact organizational costs, schedule or performance
- **Medium** - Risk has potential to slightly impact organizational costs, schedule or performance
- **Low** - Risk has relatively little impact on organizational costs, schedule or performance

**D. Risk Monitoring and Control**

The Compliance Officer and senior management will engage in a risk monitoring and control process and develop strategies and plans to minimize the effects of the risk to a point where it can be controlled and managed. Higher priority risks receive more attention than lower priority risks. The President and CEO and the Board will be notified of significant changes to the status of risks, such as an increased impact or higher probability of occurrence.

The Compliance Officer, with the input from senior management and staff, will identify ways to prevent the risk from occurring or reduce its impact or probability of occurring. This may include, but is not limited to, implementing new policies, expanding resources, adding new responsibilities to employees or departments and increasing monitoring. Issues may be escalated to the President and CEO and the Board if mitigation efforts become ineffective or do not produce the desire result.

**VI. CONCLUSION**

This Plan is intended to establish a framework for compliance by Philadelphia Works with applicable laws, regulations and requirements. It is not intended as a comprehensive compilation of all Philadelphia Works’ substantive practices and procedures that are designed to facilitate and achieve compliance. Philadelphia Works has already established various compliance policies, which will be a part of its overall compliance enforcement program.
APPENDICES

A: Evacuation Plan
B: Shelter in Place Plan
C: Travel Policy
D: Business Expense Policy
E: Philadelphia Works Grievance Procedure for Participants
F: Grievance and Complaint Procedure for PA CareerLink® Staff
G: Contractor Appeal Policy
H: Philadelphia Works Record Retention Policy
I: Philadelphia Works’ Archiving Procedures
J: Philadelphia Works’ Privacy and Confidentiality Policy
K: Electronic Systems Access and Deactivation Policy
L: Right-to-Know Policy
M: Whistleblower Policy
N: Annual Self-Assessment
O: Departmental Compliance Evaluation

Refer to Employee Information Manual dated July 1, 2012 for the following policies:

- Conflict of Interest Policy
- Code of Ethics
- Compliance and Code of Conduct
- Sexual Harassment
- Workplace Violence
- Drug-Free Workplace
The Philadelphia Works Compliance Plan Self-Assessment is an appraisal instrument that is intended for use by Philadelphia Works to monitor compliance with its Compliance Plan (“the Plan”) to evaluate compliance in the areas of:

1. Written Policies & Procedures
2. Assessment of Compliance Framework
3. Training & Education
4. Complaints, Grievances & Appeals
5. Communication Lines & Access to Compliance Officer
6. Business Records
7. Responding to Offenses & Developing Corrective Action
8. External Regulatory Contact
9. System for Routine Identification of Compliance Risk Areas

The Self-Assessment is conducted on an annual basis to measure the effectiveness of the Philadelphia Works Compliance Plan. The review will contain an evaluation of the overall success of the program and help identify any weaknesses in the compliance program to implement appropriate changes. The Compliance Officer will report the results of the review and the recommended changes of standards and procedures to the President and CEO.

The Self-Assessment is used in conjunction with the Departmental Compliance Evaluation, which is applied to periodically test conformity to the applicable standards and procedures throughout the organization and within each Business Unit and Department.
**Philadelphia Works Compliance Plan**

**Self-Assessment Tool**

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<tbody>
<tr>
<td>1.</td>
<td>Written Policies &amp; Procedures</td>
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<tr>
<td>a.</td>
<td>Are policies and procedures current and easily accessible?</td>
<td>Review Philadelphia Works website to ensure all policies are posted. Review policies and procedures for legal updates and consistency with current processes.</td>
<td>Y</td>
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<td>b.</td>
<td>Do employees have a clear understanding of the values, mission and vision, goals and priorities of the organization?</td>
<td>Interview employees about their knowledge of Philadelphia Works’ mission, etc. Ask them if they are aware of its strategic priorities and organizational goals</td>
<td>Y</td>
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<td>2.</td>
<td>Assessment of Compliance Framework</td>
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<td>a.</td>
<td>Has the compliance program been adequately implemented within the organization?</td>
<td>Interview staff and management regarding their knowledge of compliance guidelines and the Plan.</td>
<td>Y</td>
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<td>b.</td>
<td>Does the compliance program provide guidance to employees on how to identify and communicate compliance issues?</td>
<td>Interview staff and management regarding their knowledge of compliance guidelines and the Plan.</td>
<td>Y</td>
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<td>c.</td>
<td>What is management’s attitude towards compliance with laws and regulations? Is the philosophy and operating style of management compliance-focused?</td>
<td>Interview management regarding their philosophy and management style with a focus towards compliance.</td>
<td>Y</td>
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*Key:* Y=Yes; N=No; P=Partial; NA=Not applicable
### Philadelphia Works Compliance Plan

#### Annual Self-Assessment 1/1/14

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<td>d.</td>
<td>Does the assignment of responsibility, delegation of authority and establishment of related policies and procedures provide a basis for effective accountability and control? United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, Sec. 1; 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(2)(B) &amp; (C)</td>
<td>Review organizational chart and job descriptions to determine if modifications are necessary.</td>
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<td>3.</td>
<td><strong>Training &amp; Education</strong></td>
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<td>a.</td>
<td>Is there evidence of a compliance training program and ongoing training? OIG Compliance Program, Guidelines for Hospitals (63 Fed Reg §8987, Feb. 23, 1998), Section II, Compliance Program Elements, p. 8989; 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(4)(A)</td>
<td>Obtain copy of: (1) xx educational training materials utilized for compliance training upon hire; (2) xx educational training materials utilized for compliance training annually; (3) any additional compliance related training that occurred outside of regular training; and (4) copy of sign-in sheet of participants for each training.</td>
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<td>b.</td>
<td>Is the compliance training made part of the orientation for new employees? OIG Compliance Program, Guidelines for Hospitals (63 Fed Reg §8987, Feb. 23, 1998), Section II, Compliance Program Elements, p. 8989; 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(4)(A)</td>
<td>Obtain copy of xx employee records confirming: (1) employee received Plan; (2) employee received initial compliance training; and (3) employee received annual compliance training.</td>
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<td>4.</td>
<td><strong>Complaints, Grievances &amp; Appeals</strong></td>
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<td>a.</td>
<td>Are grievance procedures for participants being properly followed? 20 CFR §667.600; WIA §188</td>
<td>Review Philadelphia Works’ Grievance Procedures for Participants. Obtain copy of xx complaints from participants including: nature of allegation; steps taken; information revealed during investigation; outcome; and resolution.</td>
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<td>b.</td>
<td>Are grievance procedures for contractors, subcontractors and providers being properly followed? 20 CFR §667.600; WIA §188; WIIN 1-07, Change 1, Section VIII</td>
<td>Review Philadelphia Works’ Grievance Procedures for Subcontractors. Obtain copy of xx complaints from subcontractors including: nature of allegation; steps taken; information revealed during investigation; outcome; and resolution.</td>
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<td>c.</td>
<td>Are training provider appeals being handled properly and timely? 20 CFR §667.600; WIA §188; WIIN 1-07, Change 1, Section VIII</td>
<td>Review Philadelphia Works’ Appeal Procedures from Training Providers; Obtain copy of xx appeals including: nature of appeal; steps taken; information revealed during investigation; outcome; and resolution.</td>
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<td>5</td>
<td>Communication Lines &amp; Access to Compliance Officer</td>
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<td>a. Does evidence exist to demonstrate that the Compliance Officer is conducting her or her compliance duties satisfactorily? 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(2)(C)</td>
<td>Examples can be provided through performance reviews, supervisor input, leadership team input and list of tasks and accomplishments.</td>
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<td>b. Does the Compliance Officer periodically communicate with the governing board on the activities of the compliance program? OIG Compliance Program, Guidelines for Hospitals (63 Fed Reg §8987, Feb. 23, 1998), Section II, Compliance Program Elements, p. 8989; 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(4)(A)</td>
<td>Review Executive Committee and Board meeting minutes for communications. If yes, provide examples of how the Compliance Officer discusses those points.</td>
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<td>6</td>
<td>Business Records</td>
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<tr>
<td>a.</td>
<td>Were all Right to Know requests properly and timely handled? 65 P.S. §§67.101-3014</td>
<td>Obtain copy of all Right to Know requests and review including nature of requests; response to request; timeline for request; and fees collected, if applicable.</td>
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<td>b.</td>
<td>Are archiving processes being properly followed? 29 CFR §97.42</td>
<td>Obtain copy of xx vendor records and compare to Philadelphia Works archiving records to confirm consistency.</td>
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<td>7.</td>
<td>Responding to Offenses &amp; Developing Corrective Action</td>
<td>Obtain copy of all reports of potential violations and investigation conducted, including date of allegation; nature of allegation; steps taken; information revealed during investigation; outcome; and resolution.</td>
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<td></td>
<td>b. Has there been any retaliation against employees who submitted complaints and/or violations of the Compliance Plan or Code of Ethics through the Whistleblower Policy? If yes, was a proper investigation conducted? <strong>Whistleblower Protection Act, 5 USC §1201, et.seq.; Title VII of the Civil Rights Act of 1964, as amended; 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(5)(C)</strong></td>
<td>Obtain copy of all reports of retaliation and investigation conducted including date of incident; nature of allegation; steps taken; information revealed during investigation; outcome; resolution and corrective action plan, if warranted.</td>
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<td></td>
<td>c. If corrective action and/or disciplinary action was taken for violations of the Plan, was the corrective action and/or disciplinary action fairly and consistently applied? <strong>Title VII of the Civil Rights Act of 1964, as amended; OIG Compliance Program, Guidelines for Hospitals (63 Fed Reg §8987, Feb. 23, 1998), Section II, Compliance Program Elements, p. 8989; 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(6) &amp; (7)</strong></td>
<td>Obtain copy of xx disciplinary actions during past year and compare each to ensure consistency.</td>
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<td>8.</td>
<td>External Regulatory Contact</td>
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<td></td>
<td>a. Were external regulatory audits and/or monitoring visits handled properly? If there were findings identified by the regulators, were all findings timely corrected? <strong>20 CFR 667.505; WIIN 2-00, Change 2, Section VII, Local Area Monitoring Guidelines; OIG Compliance Program, Guidelines for Hospitals (63 Fed Reg §8987, Feb. 23, 1998), Section II, Compliance Program Elements, p. 8989</strong></td>
<td>Obtain copy of external monitoring reports, including at least one fiscal and one programmatic, to include: scope; findings; recommendations; corrective action plan, if warranted; and continued follow up plan, if warranted.</td>
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### Philadelphia Works Compliance Plan
Annual Self-Assessment 1/1/14

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<th>No</th>
<th>Area</th>
<th>Action Required</th>
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<th>Comments</th>
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<tr>
<td>b.</td>
<td>Was the OMB Circular A-133 audit handled properly? If there were findings identified, were all findings timely corrected? <strong>OMB Cir. A-133</strong></td>
<td>Obtain copy of OMB A-133 report from prior year to include: scope; findings; recommendations; corrective action plan, if warranted; and continued follow up plan, if warranted.</td>
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<td>9.</td>
<td><strong>System for Routine Identification of Compliance Risk Areas</strong></td>
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<tr>
<td>a.</td>
<td>Does a system exist within the Compliance Plan to routinely identify compliance risk areas? <strong>2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(b)(5)(A) &amp; (B); 2005 Federal Sentencing Guidelines Manual, Effective Compliance &amp; Ethics Program, §8B1(c)</strong></td>
<td>Obtain and review prior year’s Self-Assessment and compare to current Self-Assessment to determine if additional risks should be identified or current risks should be modified. If yes, set deadline to modify.</td>
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Review Summary
Annual Self-Assessment

The following is a summary of the Annual Self-Assessment of Philadelphia Works’ Compliance Plan, including findings and recommendations.

Finding:

Recommendation:

Finding:

Recommendation:
Finding:

Recommendation:

Finding:

Recommendation:

Finding:

Recommendation:
Philadelphia Works Departmental Compliance Evaluation
Business Unit/Department: ____________________________________________

Date of Report: ______________________________________________________

Period of Time Reviewing: ____________________________________________

Statement and Purpose of Evaluation:

Ongoing testing and evaluation is essential for the effectiveness of the Philadelphia Works Compliance Plan. Pursuant to the provisions of the Compliance Plan, the Compliance Officer is responsible for periodically testing conformity to the applicable standards and procedures within particular departments and throughout the organization through a Departmental Compliance Evaluation. These testing procedures were designed to examine the practices of the various Philadelphia Works business units and departments that pose risk of noncompliance. In response to any instances of noncompliance, the Compliance Officer will develop a corrective action plan to remedy any deficiencies identified in the results and provide the corrective action plan to those individuals who will be charged with the responsibility of implementing it. The Compliance Officer will report the results of the testing procedures to the President and CEO and summarize the recommended changes.

This Evaluation is used conjunction with the Compliance Plan Self-Assessment, which is conducted on an annual basis to measure the effectiveness of the Philadelphia Works Compliance Plan.
# Philadelphia Works Departmental Compliance Evaluation

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<tr>
<td>1.</td>
<td><strong>Board Compliance</strong></td>
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<tr>
<td>a.</td>
<td>Is the Board consistently comprised of at least 51% private sector representatives? <strong>20 CFR §661.315(d)</strong></td>
<td>Obtain and review prior year and current board membership and composition.</td>
<td></td>
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<td>Y</td>
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<tr>
<td>b.</td>
<td>Does Board consist of all the mandated seats from the appropriate sectors? <strong>20 CFR §661.315(a), WIA § 117</strong></td>
<td>Obtain and review prior year and current board membership and composition.</td>
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<td>c.</td>
<td>Was all necessary and required paperwork for each board member completed accurately and in a timely manner? <strong>WIIN 3-03, Change 2, Guidelines for Local Investment Boards; Public Official &amp; Employee Ethics Act, 65 PA CS §1101-13.</strong></td>
<td>Obtain and review copy of xx board member files including Statement of Financial Interest Form from current year and prior year; Conflict of Interest Form, Tax Clearance Form and Letter of Nomination.</td>
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<td>d.</td>
<td>Have all findings/concerns identified by the Commonwealth during its prior annual Investment Board Membership Review been resolved within the stated deadline? <strong>WIA § 117; WIIN 3-03, Change 2, Guidelines for Local Investment Boards.</strong></td>
<td>Obtain and review prior year’s Membership Review documentation to include scope; findings; recommendations; corrective action plan, if warranted; continued follow up plan, if warranted; and resolution.</td>
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<td>2.</td>
<td><strong>Research, Policy &amp; Innovation Unit</strong></td>
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<td>a.</td>
<td>Are mandatory reports submitted accurately and within the designated time frames? <strong>29 CFR §97.40(b); 20 CFR §667.300(a); WIA §185; TEN No. 9-06; 45 CFR Part 265</strong></td>
<td>Obtain and review samples of xx programmatic reports and xx financial reports for different time periods throughout the year. Review reporting requirements and specific deadlines for each.</td>
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<tr>
<td>b.</td>
<td>Is data inputted correctly from documentation received and is validation routinely performed to ensure accurate input of source data? <strong>29 CFR §97.40(b); 20 CFR §667.300(a); WIA §185; TEN No. 9-06; 45 CFF Part 265</strong></td>
<td>Obtain and review samples of xx programmatic reports and xx financial reports for different time periods throughout the year. Review reporting requirements and specific deadlines for each.</td>
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<td>c.</td>
<td>Were there any discretionary grants overseen by this Unit in the past year? If yes, see Sections 2a and 2b below.</td>
<td>Determine if there were any discretionary grants from the past year.</td>
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<tr>
<td>2a</td>
<td>Discretionary Grant Monitoring - Programmatic</td>
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<tr>
<td></td>
<td>a. Are written monitoring tools and procedures used to monitor all elements of discretionary grants against performance objectives in compliance with uniform administrative requirements? WIIN 3-00, Change 2, Section VII, Local Area Monitoring Guidelines; WIA §117(d)(4); 20 CFR §667.400(c)(1); 20 CFR §667.410(a)(2) &amp; (3); United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, pp. 2-2, 2-3.</td>
<td>Review programmatic monitoring tools (e.g., protocols, manuals and general instructions) for at least one discretionary grant program and compare to regulatory and contractual requirements.</td>
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<td>b. Are monitoring protocols and instructions clear and adequate to guide the monitoring process? WIIN 3-00, Change 2, Section VII, Local Area Monitoring Guidelines; WIA §117(d)(4); 20 CFR §667.400(c)(1); 20 CFR §667.410(a)(2) &amp; (3).</td>
<td>Review programmatic monitoring tools (e.g., protocols, manuals and general instructions) for at least one discretionary program and ensure clarity.</td>
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<td>c. Is there a pattern in the records that show monitoring procedures were not properly or inconsistently applied? Are there any other areas of weakness in the monitoring process? WIIN 3-00, Change 2, Section VII, Local Area Monitoring Guidelines; WIA §117(d)(4); 20 CFR §667.400(c)(1); 20 CFR §667.410(a)(2) &amp; (3).</td>
<td>Review xx samples of written documentation of programmatic monitoring activities of at least one discretionary grant program. Interview monitors for clarification of any inconsistency between records and info provided.</td>
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<td>d. Is there written documentation including monitoring reports, findings, corrective actions and resolutions for each monitoring visit? TEGL 17-05; 20 CFR §667.500; 20 CFR §505; United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, Sec. 2</td>
<td>Review xx samples of written documentation of programmatic monitoring activities of at least one discretionary program. If any findings are identified, include corrective action plan; recommendations; and continued follow up plan.</td>
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<td>2b</td>
<td>Discretionary Grant Monitoring – Fiscal &amp; Procurement Administrative Monitoring</td>
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<tr>
<td></td>
<td>a. Are written monitoring tools and procedures used to monitor all elements of the discretionary grant against fiscal and procurement systems in compliance with uniform administrative requirements? 20 CFR §667.400(c); 20 CFR §667.410(a)(1); 29 CFR part 96; 20 CFR §97.40; United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, Sec. 2</td>
<td>Review fiscal/procurement administrative monitoring tools (e.g., protocols, manuals and general instructions) for at least one discretionary program and compare regulatory and contractual requirements.</td>
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<td></td>
<td>b. Are monitoring protocols and instructions clear and adequate to guide the monitoring process? 20 CFR §667.400(c); 20 CFR §667.410(a)(1); 29 CFR part 96; 20 CFR §97.40</td>
<td>Review fiscal/procurement administrative monitoring tools (e.g., protocols, manuals and general instructions) for at least one discretionary program and ensure clarity.</td>
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### Business Unit/Department

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<td>c.</td>
<td>Is there a pattern in the records that show monitoring procedures were not properly or consistently applied? Are there any other areas of weakness in the monitoring process? <strong>20 CFR §667.400(c); 20 CFR §667.410(a)(1); 29 CFR part 96; 20 CFR §97.40</strong></td>
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<tr>
<td>d.</td>
<td>Is there written documentation including monitoring reports, findings, corrective actions and resolutions for each monitoring visit? <strong>TEGL 17-05; 20 CFR §667.500; 20 CFR §505; United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, Sec. 2</strong></td>
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### Finance Unit - Accounting Department

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<td>a.</td>
<td>Does the organization compare actual expenditures to approved budget on a regular basis to determine if modifications of budget are necessary? <strong>20 CFR §667.410(a)(1); 29 CFR §95.20(b)(4); 29 CFR 97.21(b)(4); WIIN 2-00, Change 2, Technical Assistance Guide</strong></td>
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<tr>
<td>b.</td>
<td>Does the organization have controls in place to prevent incurring obligations in excess of funds available? <strong>20 CFR §667.410(a)(1); OMB Cir. A-87, Att. B; OMB Cir. A-133</strong></td>
</tr>
<tr>
<td>c.</td>
<td>Does the organization have a system in place for recording and tracking commitment, obligations, and expenditures and reconciling financial data? <strong>20 CFR §667.410(a)(1); OMB Cir. A-87, Att. B; OMB Cir. A-122; Att. B</strong></td>
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<td>e.</td>
<td>Is program income being documented correctly and used to provide additional services under the grant? <strong>20 CFR §667.200(a)(5); 20 CFR §667.300(c)(3); 29 CFR §95.24; 29 CFR §97.25(g); WIIN 2-00, Change 2, Technical Assistance Guide, pp. 2-1 thru 2-4; WIA §195(7)(A)</strong></td>
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<td>f.</td>
<td>Is there written evidence that costs allocated to the grant are being treated consistently over time and within the accounting system? <strong>20 CFR §667.210; 20 CFR §667.220; 20 CFR §667.410(a)(1); WIA §185(g); OMB Cir. A-87, Att. A</strong></td>
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<td>g.</td>
<td>Are all financial reports submitted timely and accurately?</td>
<td>Obtain and review xx samples of financial reports for different time periods throughout year. Review reporting requirements and specific deadlines.</td>
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<td>4.</td>
<td>Finance Unit - Technology &amp; Supportive Services Department</td>
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<td>a.</td>
<td>Does the organization have a system for acquisition, management and disposition of equipment purchased with grant funds?</td>
<td>Review Procurement Policy and other written guidelines that are used in the procurement of goods and service to ensure compliance with procedures.</td>
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<td>b.</td>
<td>Does the organization maintain an inventory of equipment purchased with grant funds?</td>
<td>Obtain and review copy of inventory list for prior year.</td>
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<td>c.</td>
<td>Is the organization following its Record Retention Policy?</td>
<td>Obtain and review xx samples of archived files and logs. Compare to Record Retention Policy.</td>
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<td>5.</td>
<td>Finance Unit – Contracts Department</td>
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<td>a.</td>
<td>Does the organization conduct procurement activities for program services in a manner to ensure full and open competition?</td>
<td>Obtain and review all RFP files for xx programmatic contracts in the past year, including RFP advertising campaign materials, scoring sheets for each submission, all RFP’s for the contract and the selected RFP. Review Procurement Policy to ensure consistency with procedures.</td>
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<td>b.</td>
<td>Do programmatic contract agreements contain clear, specific and measurable performance goals?</td>
<td>Obtain and review xx copies of subcontracts from an EARN provider and a WIA provider to determine whether agreements contain clear and specific goals.</td>
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<td>c.</td>
<td>Do programmatic contract agreements contain any provisions requiring corrective action when goals are not met?</td>
<td>Obtain and review xx copies of subcontracts from an EARN provider and a WIA provider to determine whether agreements contain corrective action language.</td>
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<td>d.</td>
<td>For programmatic contracts, are subcontractors projected to meet all performance goals by the end of the grant period?</td>
<td>Obtain and review performance data from xx programmatic contracts to determine if goals will be met. If not, if there corrective action in place?</td>
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<td>e.</td>
<td>Does the organization conduct procurement activities for supportive services in a manner to ensure full and open competition? 2 CFR §215.43; 29 CFR §95.40-48; 29 CFR §97.36; WIIN 2-00, Change 2, Technical Assistance Guide, Sections 7 and 8</td>
<td>Obtain and review all RFP files for xx supportive service contracts in the past year, including RFP advertising campaign materials, scoring sheets for each submission, all RFP’s for the contract and the selected RFP. Review Procurement Policy to ensure consistency with procedures.</td>
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<td>f.</td>
<td>Do contract agreements for supportive services contain clear, specific and comprehensible provisions? 2 CFR §215.48</td>
<td>Obtain and review xx copies of supportive service contracts to determine whether agreements contain clear and specific provisions.</td>
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<td>g.</td>
<td>Do contract agreements for supportive services contain any provisions allowing termination when specific obligations are not met? 2 CFR §215.47; 2 CFR §215.48(a), (b)</td>
<td>Obtain and review xx copies of supportive service contracts to determine whether agreements contain termination provisions.</td>
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<td>h.</td>
<td>Do contract agreements contain all appendices and attachments required by law, such as ADA checklist, budget, lobbying certification, insurance verification, etc.? 29 CFR Part 95, Appendix A; Philadelphia Works Accounting Policies &amp; Procedures, Section II.10</td>
<td>Obtain and review xx contracts from a supportive service provider, a WIA providers and an EARN provider to determine whether agreements contain all required elements.</td>
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<td>i.</td>
<td>Do contracts have appropriate signatures based on contract amounts? Philadelphia Works Accounting Policies &amp; Procedures, Section II.10</td>
<td>Obtain and review xx contract from a supportive service provider, a WIA providers and an EARN provider to determine whether contract signatures are appropriate.</td>
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<td>j.</td>
<td>For contracts involving federal funds, is there verification to demonstrate that contracting parties were not debarred or suspended? 2 CFR §215.44(d); EO 12549; EO 12689</td>
<td>Obtain and review xx copies of federal contracts and/or other supporting documentation to confirm a verification of qualifications was conducted.</td>
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<td>6.</td>
<td>Finance Unit – Fiscal Monitoring</td>
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<td>a.</td>
<td>Are written monitoring tools and procedures used to monitor all elements of the grants against performance objectives in compliance with uniform administrative requirements? 20 CFR §667.400(c); 20 CFR §667.410(a)(1); 29 CFR part 96; 20 CFR §97.40; United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, Sec. 2</td>
<td>Review monitoring tools (e.g., protocols, manuals and general instructions) for at least one Adult, Youth and TANF program that related to fiscal monitoring and compare regulatory requirements.</td>
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<td>b.</td>
<td>Are monitoring protocols and instructions clear and adequate to guide the monitoring process? 20 CFR §667.400(c); 20 CFR §667.410(a)(1); 29 CFR part 96; 20 CFR §97.40</td>
<td>Review fiscal monitoring tools (e.g., protocols, manuals and general instructions) for at least one Adult, Youth and TANF program that related to program monitoring and ensure clarity.</td>
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<td>c.</td>
<td>Is there a pattern in the records that show monitoring procedures were not properly or consistently applied? Are there any other areas of weakness in the monitoring process? <strong>20 CFR §667.400(c); 20 CFR §667.410(a)(1); 29 CFR part 96; 20 CFR §97.40</strong></td>
<td>Review xx samples of written documentation of fiscal monitoring activities of at least one Adult, Youth and TANF program from the past year. Interview monitors for clarification of any inconsistencies between records and information provided.</td>
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<td>d.</td>
<td>Is there written documentation including monitoring reports, findings, corrective actions and resolutions for each monitoring visit? <strong>TEGL 17-05; 20 CFR §667.500; 20 CFR §505; United States Department of Labor Employment &amp; Training Administration Core Monitoring Guide, Sec. 2</strong></td>
<td>Review xx samples of written documentation of fiscal monitoring activities of at least one Adult, Youth and TANF program from the past year. If any findings are identified, include corrective action plan; recommendations; and follow up.</td>
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<td>7.</td>
<td><strong>Workforce Strategies Department – Programmatic Monitoring</strong></td>
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<td>a.</td>
<td>Are written monitoring tools and procedures used to monitor all elements of the grants against performance objectives in compliance with uniform administrative requirements? <strong>WIIN 3-00, Change 2, Section VII, Local Area Monitoring Guidelines; WIA §117(d)(4); PA Department of Public Welfare EARN Program Monitoring Guide dated 11-7-2012; 20 CFR §667.400(c)(1); 20 CFR §667.410(a)(2), (3)</strong></td>
<td>Review monitoring tools (e.g., protocols, manuals and general instructions) for at least one DW/Adult, Youth and TANF program that relate to program monitoring and compare regulatory requirements.</td>
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<td>b.</td>
<td>Are monitoring protocols and instructions clear and adequate to guide the monitoring process? <strong>WIIN 3-00, Change 2, Section VII, Local Area Monitoring Guidelines; WIA §117(d)(4); PA Department of Public Welfare EARN Program Monitoring Guide dated 11-7-2012; 20 CFR §667.400(c)(1); 20 CFR §667.410(a)(2), (3).</strong></td>
<td>Review programmatic monitoring tools (e.g., protocols, manuals and general instructions) for at least one DW/Adult, Youth and TANF program that relate to program monitoring and ensure clarity.</td>
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<td>c.</td>
<td>Is there a pattern in the records that show monitoring procedures were not properly or inconsistently applied? Are there any other areas of weakness in the monitoring process? <strong>WIIN 3-00, Change 2, Section VII, Local Area Monitoring Guidelines; WIA §117(d)(4); PA Department of Public Welfare EARN Program Monitoring Guide dated 11-7-2012; 20 CFR §667.400(c)(1); 20 CFR §667.410(a)(2), (3).</strong></td>
<td>Review xx samples of written documentation of programmatic monitoring activities of at least one Adult, Youth and TANF program from the past year. Interview monitors for clarification of any inconsistency between records and information provided.</td>
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<td>d.</td>
<td>Is there written documentation including monitoring reports, findings, corrective actions and resolutions for each monitoring visit? <strong>TEGL 17-05; 20 CFR §667.500; 20 CFR §505</strong></td>
<td>Review xx samples of written documentation of programmatic monitoring activities of at least one Adult, Youth and TANF program from the past year. If any findings are identified, include corrective action plan; recommendations; and continued follow up plan.</td>
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Key: Y=Yes; N=No; P=Partial; NA=Not applicable
### Human Resources Unit

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<thead>
<tr>
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<th>Question</th>
<th>Action</th>
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<tbody>
<tr>
<td>a.</td>
<td>Have employees received notification regarding the Employee Manual and EEO policy? <strong>Title VII of the Civil Rights Act of 1964, as amended, Section 2000e-10.</strong></td>
<td>Obtain and review copy of xx employee records confirming employee received Employee Manual.</td>
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<td>c.</td>
<td>Has a safety inspection been conducted in the prior year? <strong>Occupational Safety and Health Act of 1970, Public Law 91-596, 84 STAT. 1590, as amended through January 1, 2004.</strong></td>
<td>Obtain and review all copies of safety inspection reports during the past year.</td>
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<td>d.</td>
<td>Has the organization properly investigated all complaints of discrimination and/or harassment and took disciplinary action, if necessary? <strong>WIA §188; Title VII of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; The Age Discrimination Act of 1975, as amended; Title IX of the Education Amendments of 1972, as amended; 29 CFR Part 37</strong></td>
<td>Obtain and review all reports of discrimination and/or harassment including date of allegation; nature of allegation; steps taken; information revealed during investigation; findings; outcome; and resolution.</td>
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<td>e.</td>
<td>Has the organization protected its employees who submitted complaints of alleged violations against retaliation and has a proper investigation been conducted? <strong>Title VII of the Civil Rights Act of 1964, as amended; Equal Employment Opportunity Commission Directives Transmittal Number 915.003, 1998 Compliance Manual, Section 8.</strong></td>
<td>Obtain and review copy of all reports of intimidation and/or retaliation including date of allegation; nature of allegation; steps taken; information revealed during investigation; findings; outcome; and resolution.</td>
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<td>f.</td>
<td>Has proper discipline been imposed for violations of the Employee Manual, Code of Conduct and/or Compliance Plan and administered uniformly? <strong>WIA §188; Title VII of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; 29 CFR Part 37</strong></td>
<td>Obtain and review copy of xx employee disciplinary or termination records including date of allegation; nature of allegation; steps taken; information revealed during investigation; findings; outcome; resolution and corrective action, if warranted.</td>
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<td>g.</td>
<td>Are EEO notices prominently posted in the workplace to inform staff of EEO complaint process? <strong>29 CFR §37.29-27.31</strong></td>
<td>Inspect workplace area for EEO posters and confirm correct verbiage.</td>
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**Key:** Y=Yes; N=No; P=Partial; NA=Not applicable
Review Summary
Annual Self-Assessment

The following is a summary of the Annual Self-Assessment of Philadelphia Works’ Compliance Plan, including findings and recommendations.

Finding:

Recommendation:

Finding:

Recommendation:
Finding:

Recommendation:

Finding:

Recommendation:

Finding:

Recommendation:
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Philadelphia, PA 19103
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