

## **Contractor Assistance Program Guide**

### **Opportunity Youth Career Exploration and Access (OYCEA)**

The goals of the Contractor Assistance Program (CAP) as they relate to this grant are: to ensure that reported reimbursed expenditures are supported by appropriate documentation, to ensure that reimbursed expenditures comply with the terms and conditions of the contract, to ensure that funds spent are for Opportunity Youth Career and Access activities.

The goals are to be achieved through the periodic review and verification of reported expenditures and by providing technical assistance in areas where weaknesses are noted. The Financial Oversight and Technical Assistance (FOTA) auditors analyze the expenditures to ensure they are reasonable, allowable, and properly supported by agency records and source documentation. The results of each review will be presented in a CAP report prepared by FOTA and issued to the contractor.

This grant funded with Workforce Innovation and Opportunities Act (WIOA) will support the provision of career exploration services to eligible youth, with programing focused on in-demand occupations as well as engagement with business partners and other organizations. Eligible youth are at least 14 years old but younger than 18 years old at the time of the program enrollment, are attending, enrolled or eligible to be enrolled in school and resides in the county in NY State specified in the RFP.

#### **CAP PROCEDURES**

##### **A. Initial Steps**

1. Receive Opportunity Youth Exploration and Access (OYCEA) contract assignment from the FOTA Office Manager.
2. Review a copy of the OYCEA Request for Proposals (RFP), the Program narrative, and the corresponding Questions and Answers.
3. Make an initial contact with the contractor to share contact information and to inquire if the contractor needs technical assistance concerning contract records, reporting of expenditures and other aspects of the contract.
4. Obtain a copy of the contract and copies of the Detailed Reimbursement Requests (DRR) from the Contract Development and Processing Unit (CDP). These can also be printed from the WD Contracts folder on the server.

##### **B. Set up CAP Visit**

1. Telephone/contact the contractor to arrange a date and time for the site visit.
2. Send an e-mail to the contractor confirming the date and time. Include an outline that defines the scope of and the items needed for the review. **Label as Exhibit 3.**
3. Telephone/contact the contractor prior to the start date of the visit as a reminder.

##### **C. Prior to CAP Visits**

1. Review the Reimbursement Requests and prepare a spreadsheet of the reimbursed expenses and compare the actual expenditures to the line item budgets. **Label as Exhibit 1.**
  2. Prepare a Schedule of Cash Receipts. **Label as Exhibit 2.**
- If this is not the first review for the contract, review the prior CAP report, technical assistance given, and notes from prior work papers.

##### **D. Entrance Conference**

1. Subjects discussed at an entrance conference may include, but are not limited to:
  - a. the purpose of the CAP Program;
  - b. the procedures used by the FOTA auditor and the contractor;

- c. problems disclosed during prior review visits if any.
2. Maintain a record of the meeting in the CAP work papers. **Label Exhibit 3.**

**E. Verification of Cash Receipts**

Verify that all contract payments have been received from NYSDOL and have properly and promptly been deposited into a grantee bank account. **Update Exhibit 2.**

**F. Examination of Reimbursed Expenses**

Compare and reconcile reported/reimbursed expenditures to Contractor's books and investigate any differences. (This may be added to Exhibit 1)

If applicable, review Detailed Reimbursement Requests (DDR's) to ensure that any adjustments needed because of a prior review have been properly made. Sample the following budget items and prepare exhibits as listed.

**1. Salaries**

- Examine a sample of reported salary costs. Samples may be selected from the DRR.
  - Examine titles/roles of staff reported to ensure costs are budgeted.
  - Trace sample to payroll registers.
  - Examine timesheets, time distribution records (if salaries are allocated) and canceled checks/bank statements for verification of wages payments.
  - Examine cumulative leave records to verify that the leave taken are correctly posted.
  - Prepare an analysis schedule for the workpapers and **Label as Exhibit 4.**
- ensure Contractor is current on payment of federal and state withholding taxes by examining most recent quarter's 941 and NYS-45 reports. If necessary, review the relevant W2 or 1099 forms for the period and compare to reported salaries.

**2. Staff Fringe Benefits**

- Examine an appropriate level of reported fringe benefits.
  - Verify applicable rates and calculations for all benefits reported. Include a copy of the verification as part of the workpapers.
  - Reported amounts(samples) are to be traced to monthly invoices, policies, quarterly statements, and other pertinent documentation. **Label as Exhibit 5.**
  - Investigate all differences.
- If the entity has an approved fringe benefit rate, obtain a copy as part of the exhibit and use this rate for the calculation and verification of the reported fringe benefit cost.

**3. Contracted Services**

If outside vendor/consultant performs services:

- Verify that the vendor/consultant and services are the same as what was approved in the contract or in subsequent contract modifications or approvals.
- Obtain a copy of the vendor/consultant contract (if applicable).
- Verify that the vendor/consultant services were performed in accordance with both the contract between NYSDOL and OYCEA Program contractor and between the OYCEA Program contractor and the training vendor/consultant.
- Also, verify that the vendor/consultant services were incurred within the contract periods.

- Examine documentation to support payment to contractors (invoices, participant class attendance records if applicable, and cancelled checks and/or bank statement verification).
- Prepare a schedule and/or narrative outlining what was reviewed, and any issues found. **Label as Exhibit 6.**

**4. Non-Personal Service costs:**

**Travel:** Examine to ensure that the time and travel is associated with the services. Ensure that proper documentation, dated travel logs, invoices and cancelled checks exist. Verify the rate applied to travel is consistent with the contractors' travel policy and no higher than the government rates per <https://www.gsa.gov/travel/plan-book/per-diem-rates> as required in the New York State Master Grant terms. Only travel costs for personnel listed under staff salaries are acceptable.

**Rent:** examine lease agreement, invoices, proof of payment such as cancelled checks/bank statements. If the space is shared by the program, verify the allocation is done properly and justified.

**Other Operating Expenses:** Examine appropriate support documentation such as invoices, cancelled checks to verify reported costs. Make sure that reported items are allowable per contract budget. Verify allocation of expenses, if necessary. **Label as Exhibit 7**

**5. Participant Retention and support services payments:**

Participant retention services includes Participant incentives, stipends and guidance and counseling services; support services include child care assistance, dependent care assistance, housing assistance, transportation assistance etc. (refer RFP for details)

Verify that participant retention service and support service are paid in compliance with contract budget. Verify that stipends are properly supported with documentation such as participant benchmarks, milestones, sign-in sheets/logs /attendance records, payroll, and cancelled checks. Verify that the stipends do not exceed the cap per participant, if applicable. **Label as Exhibit 8.**

**6. Indirect Costs:**

Indirect costs are costs that are not directly accountable to a program, function, or activity, but are necessary for the general operation of the organization. Indirect costs under this RFP may be reimbursed at either a federally approved indirect cost rate if the bidder has one, or if no approved rate exists, a de minimis rate of 10% of modified total direct costs (MTDC) of the total cost of the program may be reimbursed. Verify the costs included in the rate are also not expensed directly to the grant. **Label as Exhibit 8. (can be combined with Other Operating Expenses analysis).**

**G. Allowable Use of Funds (per RFP-page 4):**

Funds may be used to cover the fees for services, including, but not limited to:

- Career exploration and access services, which must include Initial assessment, Career Pathway Exploration, National Work Readiness Credentials (NWRC), Tutoring and Assistance in preparation for High School Diploma, Paid/unpaid internship, Life skills Training and Financial Literacy Education.
- Youth Retention Services, which must include – Participant Incentives, Stipends, support network, and comprehensive guidance/ counseling.
- Support Services, which must include – Child care assistance, community service linkage, dependent care assistance, educational testing, education related assistance, employment or training related assistance, health and mental health care referrals, housing assistance, reasonable accommodation for individuals with disabilities, transportation assistance, work attire assistance, work related tool assistance.

**H. Restrictions on the Use of Funds (Per RFP- Page 5 and 6)**

The OYCEA Program will not pay for any of the following:

- The purchase, lease or rental of any equipment or operational software;
- The purchase, lease or rental of videos;
- Political activities;
- Written or verbal marketing materials which do not solely provide information regarding youth career exploration and access resources;
- Awards of cash, trophies or the like;
- Purchase and/or rental of cellular telephones and devices;
- Audit services;
- Acquisition, construction, or renovation of buildings or other real estate;
- Entertainment;
- Interest costs incurred by provider agencies;
- Costs of organized fund raising;
- Registration fees not directly associated with the provision of career exploration and access services;
- Payment of fees associated with attendance at seminars, conferences, or meetings of professional organizations not directly associated with the provision of career exploration and access services; or
- Any other cost deemed inappropriate by NYSDOL, such as service that does not directly benefit the participants or any cost that does not meet the intent of this RFP.

**I. Technical Assistance**

There are no set procedures to follow for providing technical assistance. Each situation is unique. The FOTA auditor must determine what is appropriate. All technical assistance given must be documented in the work papers. Any necessary follow-up assistance should also be detailed in the work papers.

**J. Exit Conference**

1. An exit conference is to be held at the end of every review visit.
2. Subjects discussed at the exit conference may include, but are not limited to:
  - a. all findings disclosed during the review
  - b. how the contractor will resolve any current findings
  - c. resolution of any prior findings
  - d. technical assistance
  - e. subsequent reviews
3. Open discussions should be encouraged at the meetings.
4. Maintain a record of the meeting in the work papers. **Label as Exhibit 9.**

**K. Preparation of Work papers**

1. Ensure that all work papers detail all issues, the authority applied/relied upon, and conclusion.
2. Prepare narrative detailing all issues/problems, Findings, Observations, and points of interest etc. disclosed during the CAP visit. **Label as Exhibit 10.**



<b>Exhibit 3</b>	<b>Entrance Conference and/or Email/correspondence confirming site visit and information requested.</b>
<b>Exhibit 4</b>	<b>Staff Salaries</b>
<b>Exhibit 5</b>	<b>Staff Fringe Benefit</b>
<b>Exhibit 6</b>	<b>Contracted Services</b>
<b>Exhibit 7</b>	<b>Travel Expenses, Space Rental, other expenses and indirect cost</b>
<b>Exhibit 8</b>	<b>Stipends, incentives and supportive services</b>
<b>Exhibit 9</b>	<b>Exit Conference</b>
<b>Exhibit 10</b>	<b>Monitor's Narrative</b>
<b>Exhibit 11</b>	<b>CAP Report</b>