

**Department of Workforce Development  
Division of Workforce Solutions (DWS)  
Civil Rights Compliance (CRC) Monitoring Plan  
July 1, 2006 – December 31, 2009**

*Purpose:* DWS CRC monitoring is designed to address agencies (hereafter known as recipients) that receive state/federal funds under contract/grant or other agreement from DWS, including Workforce Investment Act (WIA), Temporary Assistance for Needy Families (TANF) and other state/federal programs administered by DWS. The TANF and other state/federal programs include Wisconsin Works (W-2) and Related Programs, Child Care, Child Support, Refugee Assistance and others as applicable. The purpose of DWS CRC monitoring is to determine the recipient's status of compliance with Equal Opportunity, Affirmative Action and Limited English Proficiency requirements. It is an opportunity to determine if technical assistance or other assistance is needed by the recipient in order to assure equal opportunity and accessibility to programs/services/activities.

*Method:* DWS CRC monitoring may occur via on-site visits or desk monitoring. Desk monitoring may include monitoring of participant service data or special surveys, inquiries or self-assessments required of recipients.

*Recipient Categories and Priorities:* For the purposes of CRC monitoring, recipients are divided into three categories, and the selection of recipients for on-site or other CRC monitoring is based on priorities applicable to the grant/contract funding. The following are the recipient categories and selection priorities:

**Categories:**

- Recipients that are Workforce Development Boards.
- Recipients that are required to submit a CRC Plan (25 or more employees in their agency and receive \$25,000 or more in total government funding).
- Recipients that are required to submit a CRC Letter of Assurance (fewer than 25 employees in their agency or receive less than \$25,000 in total government funding).

**Priorities:**

- Recipients that are Workforce Development Boards.
- Recipients that are operating a new or complex program or that are serving large numbers of individuals in the population or in a protected group.
- Recipients that have implemented corrective action in response to CRC or program monitoring or other means (complaints, newspaper articles, etc.) or are subject to increased requirements on accessibility for persons with disabilities and Limited English Proficiency.
- Recipients that are new or that have not held a contract/grant with DWS in the last three years.

*Frequency:* DWS will conduct CRC monitoring in an ongoing manner. On-site monitoring schedules will be developed quarterly. Special surveys, inquiries or self-assessments required of recipients will be identified and implemented as appropriate.

*Scheduling:* The DWS contract manager, local program liaison or Civil Rights Unit will initiate the scheduling of monitoring visits with recipients and provide notifications of other requirements as may be necessary.

*Preparation:* Recipients may prepare for on-site monitoring by referencing the monitoring guide to be utilized by the reviewer at [http://dwd.wisconsin.gov/dws/civil\\_rights/monitoring.htm](http://dwd.wisconsin.gov/dws/civil_rights/monitoring.htm). Additional monitoring formats as may be required in the future for special surveys, inquiries or self-assessments may also be found on the site, and when formalized, the on-site monitoring schedule will be available on the site.

*Results:* Recipients will be notified of the monitoring results in a timely manner. Communications will be directed to the grant/contract signature designee for the recipient. Draft reports will be issued following on-site visits and provide for a recipient response timeline prior to issuance of a final report. Requirements for other types of monitoring which may be developed and implemented during this period will include procedures for response prior to issuance of results.