



Workforce Innovation and Opportunity Act

Monitoring Policy Manual

No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity.



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Equal Opportunity Employment/Program.
Auxiliary aids and services are available upon request to individuals with disabilities.



Monitoring Policy

ROLES AND FUNCTIONS:

Local Board

The Northeast Workforce Development Board (NEWDB), through its members, officers and Executive Committee, is responsible for conducting oversight and monitoring of all DOL programs and the One-Stop System, as prescribed by the Governor's Oversight and Monitoring Policy (OWDI#11-2017). To ensure compliance with federal, state and local administrative and financial requirements, they will also provide oversight regarding policies and procedures being used in the local area and ensure that performance goals are being achieved. They will receive quarterly reports from the NEWDB Monitor on the results of all monitoring activities, and will also receive any oral or written reports generated by the NEWDB Director regarding significant monitoring or compliance issues that have come to his/her attention. In the event that a monitoring report results in a questioned cost or negative finding against the NEWDB or their service provider/s, the NEWDB will work in coordination with the Oklahoma Office of Workforce Development (OOWD) and the Chief Local Elected Official (CLEO) to resolve the issue.

Authority

Within the NEWDB the compliance monitor or other board staff, and the CLEO-designated fiscal agent have local oversight and monitoring responsibilities for programs funded through the US Department of Labor (DOL). The NEWDB is responsible for monitoring all DOL-funded programs and the Oklahoma Works (One-Stop) System to ensure compliance with federal, state, and local policies, plans, and procedures. The NEWDB and fiscal agent are responsible for overseeing and monitoring WIOA and other federal grant-funded activities and those of their subrecipients in order to:

- a. determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and the regulations in this part;
- b. determine whether or not there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws, regulations, and contracts; and
- c. provide technical assistance as necessary and appropriate.

Board Staff Administrative Responsibilities

The NEWDB staff will be responsible for the notification of all involved parties and ensuring that corrective actions are taken when problems are found. The director will also be responsible for ensuring the notification of the board chair and/or board executive committee immediately through written or oral notification of any situations deemed potentially serious and pressing. A timeframe is established later in this document for the completion of corrective actions and procedures established for follow-up monitoring to ensure corrective action has been taken.

The NEWDB shall provide the OOWD with up-to-date copies of all local areas' plans, contracts, memorandums of understanding, grants, sub-grants, reports, records, and files applicable to programs administered by the OOWD.

The NEWDB shall provide the OOWD with all pertinent work papers, correspondence, and reports relating to the particular local area being monitored. The NEWDB shall also provide the OOWD with all copies of any regulations; issuances; changes to plans, contracts, memorandums of understanding, grants, sub grants, reports and records; and correspondence pertinent to all programs administered by the OOWD. Copies of regulations, issuances, policies, procedures, reports, board minutes and correspondence submitted by the NEWDB, boards staff, and fiscal agents to the OOWD must be signed attesting to official board approval.

NEWDB board staff will be responsible to:

- a. Ensure monitoring of service providers on an annual basis and at least sixty (60) days prior to expiration of the service provider or subrecipients' contract with its sub recipient, and submit monitoring reports and resolutions to OOWD Policy and Program team as requested.
- b. Provide to the OOWD Policy and Program team all requested documents at least thirty (30) days prior to the scheduled monitoring date.
- c. Have documents previously identified by OOWD as required for on-site review available in an organized, orderly manner to facilitate expedient examination by monitors.
- d. Ensure appropriate staff is available at the on-site location on the monitoring date(s) to assist OOWD Policy and Program team..

Pursuant to the following minimum standards established by the Governor, NEWDB shall ensure the service provider is periodically monitored throughout the year for:

- a. Compliance with federal, state and local area regulations, plans, policies and guidelines.
 - 1) Participant eligibility verification documentation.
 - 2) Review of participant records for assessment and employability plan.
 - 3) Review of contracts (i.e., on-the-job training, customized training, and worksite agreements).

- 4) For providers of WIOA adult and dislocated worker services, proper delivery of services consistent with the NEWDB service delivery design.
- 5) For providers of WIOA youth services, proper delivery of services consistent with the NEWDB youth program.
- b. Compliance with local established policies.
- c. Contract performance compliance.

NEWDB will submit copies of all board-approved monitoring results to OOWD for review. as required.

COMPLIANCE MONITORING RESPONSIBILITIES:

Program Activity	Responsible Staff	Type of Report	Distributed To
Program Monitoring	NEWDB Monitor	Monitoring/Oversight Report or Written Report as necessary. Monthly Report	Service Provider, NEWDB Director, NEWDB , as appropriate
System Monitoring	NEWDB Monitor	Written Summary or Oral Report, as appropriate	Service Provider, One Stop Operator, OESC Area Manager, NEWDB Director, NEWDB Chair, NEWDB, as appropriate.

SCOPE AND FREQUENCY OF MONITORING:

The scope and frequency of the NEWDB monitoring efforts shall consist of:

- a. Monitoring activities by utilizing any one or combination of monitoring tools, including desk reviews, OSL reviews, personal visits, telephone and mail contacts and/or onsite visits with the participant’s supervisors/training site representative, and center managers, resulting in a quarterly summarized written report to the NEWDB.
- b. Conducting on-site reviews of policies, plans and procedures governing all segments of their program activities and program operations at least once during the program year.
- c. Monitoring sub-recipients providing services to participants at least once during the contract period for program accountability and to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- d. Reviewing a sample of as many participants’ files as possible, but in no case less than 10% of new participants who enter occupational skills training or participate in the work experience program each year, to determine compliance with required federal, state and local laws, policies, plans and procedures.

PROGRAM MONITORING METHODS:

Program monitoring will be conducted at least once yearly and will include reviews of:

- Participant eligibility verification documentation
- Data Validation
- Priority of services
- Review of participant records for assessment and employability plan
- Review of contracts (OJT, worksite experience)
- Compliance with local established policies
- Contract performance compliance

This will be accomplished through a variety of methods including, but not limited to:

- An inspection of program documents and records
- Desk reviews of OSL records, performance reports, etc.
- Completion of monitoring review tools
- Interviews with staff and customers
- On-site observations

REPORTING OF REVIEW FINDINGS:

The NEWDB board staff will be the first line of contact during any program or system review, to ensure corrective actions are taken.

As system reviews are made, observations or findings detected by the NEWDB Monitor or NEWDB Director will be reported to the appropriate department heads (i.e. service provider director, center managers, NEWDB Chair, etc.) through a written summary or oral report, as appropriate. The written report may be accomplished through letter, standardized monitoring form or e-mail. The NEWDB Monitor will also provide a quarterly written summary to the NEWDB advising of those observations or findings. Observations will not require a response; however, findings would necessitate a response from the appropriate party within 14 calendar days. The NEWDB Monitor will then review proposed corrective actions to ensure that proposed action has been implemented. In the case of possible disallowed costs, the NEWDB Monitor will notify the NEWDB Director immediately. The Board membership will receive a summary report from the NEWDB Monitor at each Board meeting outlining the activities of the NEWDB Monitor and any potential liabilities reviewed.

As reviews are made of program elements, the NEWDB monitor will issue a Monitoring Report to the Service Provider for any deficiencies found for that monitoring activity. No Monitoring Report will be required for monitoring conducted that shows no deficiency. The service provider will have 14 calendar days to issue a corrective action response to any Monitoring Report issued. The monitor will then review corrective actions to ensure proposed action has been implemented.

In the event issues are not able to be resolved through the Monitoring Report, an Initial Determination report will be issued and the following process will apply.

CORRECTIVE ACTIONS:

If an Initial Determination report is issued by the NEWDB to the service provider, program, or agency, it will necessitate a written response to the NEWDB within 14 days. An additional 14 days may be requested in writing (with justification) and will be approved at the discretion of the NEWDB Director.

When the NEWDB receives a response to the Initial Determination, the NEWDB will then have 14 days to issue a response back to the service provider, program or agency, indicating further action required or issuing a Final Determination. This process may continue until an agreement or impasse is reached. If parties reach an impasse and are not able to resolve an issue, the matter will be forwarded to the OOWD for final determination.

A method for restitution of funds and sanctions, if applicable, will also be addressed in the Final Determination. Sanctions, if any, shall be determined by the full NEWDB membership and Local Elected Officials.

The NEWDB Monitor or director shall conduct follow-up monitoring on those deficiencies which have been addressed in the Final Determination within a reasonable amount of time, to ensure that proper corrective actions have been taken.

All finalized monitoring reports and resolutions, including corrective action correspondence, will be maintained and be made available to authorized staff.

TECHNICAL ASSISTANCE:

Any NEWDB service provider or One-Stop Partner may request technical assistance from the NEWDB by making a request in writing to the NEWDB Director. The request should describe the type of assistance requested. The NEWDB Director will reply to any such request after considering the NEWDB's priorities and available resources.

In addition, the NEWDB, CLEO, or fiscal agent may request technical assistance from the OOWD in order to ensure compliance with federal or state regulations or to expedite the resolution process.

EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT: All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

Update Approved by:



David Chaussard
Northeast Workforce Development Board Chair

11/18/17
Date