

Monitoring Policy

PURPOSE

The purpose of this Monitoring Policy is to provide guidance on the monitoring process and procedures of WIOA programs within the West Piedmont Workforce Development Board's (WPWDB) service region. This policy will outline the responsibilities of the WPWDB as it relates to monitoring the implementation and administration of WIOA programs throughout Area 17.

References: WIOA Section 183

A. LWDB Monitoring/Oversight Responsibilities

The West Piedmont Workforce Development Board, in conjunction with the CLEOs, are charged with planning and ensuring that monitoring and oversight of WIOA services and activities are consistent with federal, state, and local statutory or regulatory requirements.

The oversight processes must include the following:

1. WPWDB staff will be responsible for conducting monitoring. Written process for consistent review of sub-recipients fiscal and program operations, including One-Stop management.
2. Monitoring will occur at least once a year. Some areas may be monitored more frequently. Monitoring of sub-recipients will follow a standardized review methodology that will result in written reports which record findings, any needed corrective actions, and due dates for the accomplishment of corrective actions.
3. All written reports and other documentation pertaining to monitoring and other oversight activities must be made available for review by federal and state officials.
4. The system of record (VOS) be used to cross-check data during the review to ensure that data is accurate, timely and reflective of services provided.
Follow-up will be conducted to ensure that findings are resolved.

B. Compliance Review Areas

The major systems of local compliance review shall include but not be limited to Administrative, Financial, and Programmatic.

Administrative

A review of the administrative functions highlights whether sub-recipients are compliant with all of the provisions in their provider contract, looks at the sub-recipient's program activity and outcomes to ensure they are in line with the established goals of the contract/agreement, and determines whether the programs administered by the sub-recipients are being run effectively and efficiently.

Required Areas of Review

- Compliance with federal, state, local area, and service provider policies and procedures legal agreements, and the local WIOA plan
- Compliance with all provisions in provider contract
- A control system is in place to ensure maintenance of participant records and confidentiality of participant information

Financial

A review of the financial functions ensures the adequacy of internal controls and the reliability of the sub-recipient's financial management system as they relate to the contract. The financial review also ensures that the sub-recipient meets the fiscal terms and conditions of the contract (i.e., cost allocation, fiscal goals or requirements) and that amounts reported are accurate, allowable, supported by documentation and properly allocated.

Required Areas of Review

- Adequacy of internal controls and the reliability of the sub-recipient's financial management system as they relate to the contract
- The sub-recipient meets the terms and conditions of the contract, cost allocation, fiscal goals or requirements and that amounts reported are accurate, allowable, supported by documentation and properly allocated.
- Sub-recipient expenditures reported are detailed in the contract budget and that the reported expenditures do not exceed the line item budgets.
- Procurement policies and procedures are comprehensive and address certain topics referenced in the One-Stop Comprehensive Financial Management Technical Assistance Guide (TAG).
- Procurement activities are properly supported and documented.
- A control system is in place to ensure maintenance of property management records and procedures are in place to keep property in good condition.

Programmatic

A review of programmatic functions ensures that the implementation of WIOA programs is compliant with all applicable regulations and that participants are provided the services they need with regards to their training and employment needs.

Required Areas of Review

Compliance with federal, state, and local area guidance regarding WIOA implementation. Data in participant case files is accurate, reliable, up-to-date, and compliant.

Participant data reported in the WIOA case management and reporting system The Virginia Workforce Connection (VaWC or VOS) accurately reflects the data in participant files.

C. Monitoring Report and Corrective Action Plan

The monitor must develop a written monitoring report for each sub-recipient monitored.

Monitoring reports should cover the date of the review, number and type of files reviewed, and be structured in a way that assists service providers in reaching their goals by providing them WPWDB Monitoring Policy with feedback on program, financial, compliance and performance issues. Monitoring reports must be provided to the sub-recipients within a reasonable timeframe and should clearly identify all findings and required corrective actions.

If there are findings or concerns, a written Corrective Action Plan (CAP) must be submitted by the sub-recipient to the WPWDB in an agreed upon time frame. Local area monitoring reports, corrective action plans and follow-up activities must be available for state and federal review.

D. Local and State Technical Support Related to Monitoring

In addition to conducting statewide monitoring of the local areas, the WPWDB will coordinate state training as necessary. The state provides ongoing assistance to help local areas reduce risk, achieve WIOA compliance, strengthen and focus their corrective actions plans, and improve program performance standards. This support may include the following forms:

One-on-One Local Area

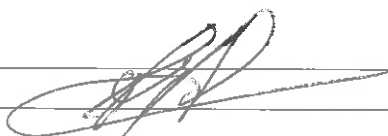
Assistance Sharing of documents, tools, etc.

On-site Local Area training (topics of specific interest/need of local area)

State-wide training

Local Monitoring Network

Approval Signature:



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