

Region 4 Workforce Investment Board Subrecipient Monitoring Policy

PURPOSE: To provide guidance regarding local oversight responsibilities for administration of federal and state funding, including WIOA funds. Oversight includes reviewing, monitoring and evaluating WIOA services delivered in WorkOne West Central. Region 4 Workforce Development Board (R4WDB) will monitor each subrecipient in order to provide reasonable assurance that subrecipients are complying, in all material respects, with laws, regulations, and award provisions applicable to the program.

REFERENCES: Workforce Investment and Opportunity Act (WIOA), WIOA Final Rules, 20 CFR Parts 667.400; Indiana Department of Workforce Development Interim Monitoring Policy 2015-06, Office of Management and Budget, 2 CFR Chapter I, Chapter II, Part 200, et al, Uniform Administrative Requirements, Cost Principles, and Audit Requirements Final Rule, Department of Labor Exceptions at 2 CFR, Part 2900, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Final Rule, Training and Employment Guidance Letter, No. 15-14.

CONTENT:

In fulfillment of its obligation to monitor its subrecipients, the following policies apply to all subawards of federal and state funds made by Tecumseh Area Partnership, Inc. (TAP) dba/ Region 4 Workforce Development Board (R4WDB).

1. The following required information will be provided to all subrecipients (as applicable):
 - a. Federal Award Identification:
 - i. Subrecipient name (which must match registered name in DUNS);
 - ii. Subrecipient's DUNS number
 - iii. Federal Award Identification Number
 - iv. Federal Award Date
 - v. Subaward Period of Performance Start and End Date;
 - vi. Amount of Federal Funds Obligated by this action;
 - vii. Total Amount of Federal Funds Obligated to this subrecipient;
 - viii. Total amount of the Federal Award;
 - ix. Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)
 - x. Name of Federal awarding agency, pass-through entity, and contract information of awarding official;
 - xi. Catalogue of Federal Domestic Assistance (CFDA) number and name.
 - b. All requirements imposed by R4WDB on the subrecipient so that the Federal award is used in accordance with the Federal statutes, regulations, and the terms and conditions of the Federal award.
 - c. Any additional requirements that R4WDB imposes on the subrecipient in order for R4WDB to meet its own responsibility to the State and/or Federal Awarding agency including identification of any required financial and performance reports.
 - d. A requirement that the subrecipient permit R4WDB and auditors to have access to the subrecipient's records and financial statements as necessary for R4WDB to meet the monitoring requirements of 2 CFR Part 200;
 - e. Appropriate terms and conditions concerning closeout of the subaward.
 - f. Subawards shall require that subrecipients submit financial and program reports on a timely basis.

Oversight/Monitoring responsibilities include the following areas:

Subrecipient Monitoring and oversight activities are not limited to those on-site and desktop procedures defined in this policy. Monitoring is a multi-faceted management activity that is directed toward achievement of program outcomes while acting in compliance with applicable laws and regulations.

A. Monitoring Scope

Compliance with applicable laws and regulations and proper handling and reporting of funds is best reviewed during on-site visits. On-site monitoring visits will review applicable program activities of financial accountability, internal controls, procurement, attendance and payroll systems

Evaluating subrecipient procedures, adherence to operational policy, data validation, and performance may be accomplished through reviews of eligibility, registration, program activities, and outcomes through state case management system, and office program files.

Subrecipient internal program monitoring is also accomplished through desktop progress reviews of eligibility, registrations, program activities, and outcomes.

B. Monitoring “High Risk” Subrecipients

The Region 4 Workforce Investment Board (R4WIB) will maintain a list of Subrecipients who are defined as “high risk”. This list will include OJT contractors who have a history of uncompleted or inadequate training (2 or more instances) and other Subrecipients which pre-award review discloses prior significant audit or monitoring problems. The R4WIB may remove an organization from the “high risk” list after successful completion of two (2) or more “high risk” on site reviews, or successful completion of the agreement.

Monitoring each agreement with a “high risk” Subrecipient begins before the agreement is executed with the development of a customized monitoring plan for that agreement. The customized plan shall include on-site visits for compliance and financial reviews at least quarterly during the term of the agreement.

C. Monitoring Guide

A monitoring guide which includes monitoring instruments will be used to govern the monitoring process.

D. Monitoring Frequency

To carry out the oversight/monitoring responsibilities, the R4WDB designee will at a minimum, monitor annually (once per fiscal year), or once during the term of the agreement if the agreement is less than twelve months:

- Monitor all WIOA Subrecipients on-site for financial and monitor all WIOA Subrecipients for operational compliance.
- Monitor all non-WIOA Subrecipients for financial and operational compliance in accordance with the provisions of the project agreement.
- Monitor local youth programs periodically--once per fiscal year or once during the term of the agreement if the agreement is for less than twelve months.

Subrecipients may be requested to provide quarterly desk top monitoring on each program and/or unique grants (Adult, DW, Youth, NEG, OJT, ITA, etc.) with a minimum of 8 file reviews per report. Quarterly monitoring report will be sent to Chief Operations Officer by Sept 15th, Jan 15th, April 15th and July 15th each program year.

E. Conduct On-Site Monitoring Visits

The R4WIB designee will be responsible for conducting on-site reviews of the Subrecipients. Financial and/or administrative staff, under the direction of the R4WIB, will conduct on-site reviews.

F. Notification of On-Site Monitoring Visits

Organizations to be monitored will be contacted to establish dates for the visit. Monitoring will normally be scheduled at least two weeks in advance, although the R4WIB designee may conduct reviews without advance notice or agreement by the Subrecipient when they so choose.

G. Monitoring Report

A written monitoring report will be provided within thirty working days after the on-site visit. The report will include the date of the review, the organizations reviewed and the reviewing entity, the purpose and scope/objective of the review, the areas that were reviewed, any compliance findings, or performance deficiencies noted, and time lines for resolution and/or corrective action for appeal. Appeals may be filed using the complaint/grievance procedure.

H. Resolution of Monitoring Report Findings

Issuance of the Monitoring Report begins the resolution process. The monitoring report will allow at least two weeks from the issuance date for a response. The R4WIB designee will provide a written final resolution notice within ninety days after the report issuance date.

Effective Date: July 1, 2018