

Region 4 Workforce Investment Board Monitoring Policy

PURPOSE: To provide guidance regarding local oversight responsibilities for administration of WIOA funds. Oversight includes reviewing, monitoring and evaluating WIOA services delivered in WorkOne West Central.

REFERENCES: Workforce Investment and Opportunity Act (WIOA), WIOA Final Rules, 20 CFR Parts 667.400; Indiana Department of Workforce Development Policy 2007-28

CONTENT: Oversight/Monitoring responsibilities include the following areas:

1. Determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and these regulations;
2. Determine whether or not there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations; and
3. Provide technical assistance as necessary and appropriate; and
4. Evaluating contractor performance.
5. Service Provider internal monitoring

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 are best reviewed during on-site visits. Regular on-site monitoring visits will review applicable program activities including: classroom training (occupational), classroom training (basic education), On-the-Job Training (OJT), work experience, financial accountability and internal controls, procurement, attendance and payroll systems, outreach and recruitment, participant assessment and referral, supportive services, and placement.

Evaluating contractor performance is best accomplished through desktop progress reviews of eligibility, registrations, program activities, and outcomes.

Service Provider internal program monitoring is also best accomplished through desktop progress reviews of eligibility, registrations, program activities, and outcomes. On-site monitoring is best accomplished by regular site visits.

B. Monitoring "High Risk" Service Providers

The Region 4 Workforce Investment Board (R4WIB) will maintain a list of Service Providers 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 service providers 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" service provider 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 process of on-site monitoring.

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 service providers on-site for financial and monitor all WIOA service providers for operational compliance.
- monitor all non-WIOA service providers and sub recipients 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.

On-site monitoring reviews may combine the first two bullet points above during any one visit.

Service Providers will provide quarterly desk top monitoring on each program and/or unique grant to One-Stop Operator. (Adult, DW, Youth, NEG, OJT, ITA, etc.) Minimum of 8 file reviews per report. Quarterly monitoring report will be sent to One Stop Operator 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 service providers. 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 visits will normally be scheduled at least two weeks in advance, although the R4WIB designee may conduct reviews without advance notice or agreement by the Service Provider or sub recipient 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, 2008

Revised: July 1, 2011 to reflect WIB status

Revised July 2014 to include Service Provider internal monitoring

Revised July 2015 to update to WIOA terminology

