

AREA 2 | SUMMIT & MEDINA WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA) POLICY LETTER A-08 | MONITORING AND COMPLIANCE

- I. **SUBJECT:** Programmatic and Fiscal Monitoring and Compliance
 - II. **PURPOSE:** The purpose of this policy is to describe how oversight and monitoring of workforce programs and the operation of one-stop service delivery system will be conducted to ensure compliance, provide a framework for continuous improvement, and impact innovative policy development and program performance.
 - III. **EFFECTIVE DATE:** July 1, 2018
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IV. BACKGROUND

WIOA requires the local Workforce Development Board (WDB) to conduct program and financial oversight of all workforce programs and the one-stop service delivery system in the local area.

The Area's staff, either directly and/or through the use of a contracted with third-party, shall monitor its contracts with the operators of the one-stop centers, and the providers of all WIOA-funded Adult Career Services and Youth Program Services for the following purposes:

1. To ensure sub-recipient compliance with agency, local, state, and federal regulations and requirements;
2. To ensure compliance with negotiated contract requirements, outcomes, and reimbursement/cost limits;
3. To ensure internal controls and systems are adequate for the services provided;
4. To evaluate the quality and effectiveness of the services provided; and
5. To provide program guidance and direction to enhance the quality of services provided to clients.

V. SCOPE OF MONITORING

Through a constant review process, the Area's staff, on behalf of the WDB, will ensure continuous improvement by performing the following types of monitoring:

1. Programmatic
2. Fiscal

Program monitoring is a review of contractually provided for services to determine whether performance under the contract is consistent with the terms and conditions of the contract and expected parameters of service. Program monitoring may include either or both of the following:

1. Reviewing the sub-recipient's documentation to determine if required services are being provided;
2. Interviewing direct delivery staff, observing service delivery, and interviewing clients to determine what services are being provided, and the quality of the same.

Fiscal monitoring is an examination of the sub-recipient's financial statements, records, and procedures. Fiscal monitoring includes, but is not limited to:

1. Reviewing the sub-recipient's invoices;
2. Comparing budgets and/or budget limits to the actual costs;
3. Obtaining reasonable documentation demonstrating that the services billed were actually delivered according to the contract; and
4. Comparing invoices with supporting documentation to determine if costs are allowable and necessary.

The intent of this policy is to prepare sub-recipients for monitoring/audits by identifying potential issues and discrepancies. The WDB will provide consulting, training, and technical assistance to sub-grantees as needed.

VI. METHOD OF MONITORING

Staff of the WDB may utilize the following methods of monitoring for compliance:

1. Monthly performance reports from contracted providers
2. State of Ohio quarterly and annual WIOA Performance Reports
3. One-stop customer service questionnaires evaluated quarterly
 - a. Provider-collected
 - b. SurveyMonkey after workshops and orientation
4. Annual Client File Review
 - a. Information Gathering
 - i. A random selection of client files, representing a statistically significant number of active files under that funding stream for the time period being monitored, is made; and
 - ii. A Fiscal Compliance Checklist is distributed to the sub-recipient being monitored to complete and return.
 - b. Desk Review
 - i. The randomly selected participant files are checked to ensure compliance with state and federal regulations, local policies, and the sub-recipient contract; and
 - ii. The completed Fiscal Compliance Checklist is reviewed for state and federal regulation, local policy, and sub-recipient contract compliance.
5. On-Site Review
 - a. A visit to the sub-recipient's place of business or location of service delivery, scheduled or unannounced, to observe staff competency, client interactions, and the quality of services provided.

VII. RESPONSIBILITIES, REPORTING, AND CORRECTIVE ACTION

At the conclusion of each monitoring review, a report will be prepared summarizing the findings and

observations made. The report will identify for each sub-recipient any errors, contract deviations, or non-compliance with local, state, and federal regulations and policies. The report will also indicate suggested best practices and, if applicable, what corrective actions are desired, the time frame for the corrective action and what, if any, actions the sub-recipient has taken to alleviate the finding.

The sub-recipient may be required at any time to develop and implement a corrective action plan or take specific actions to correct an error or address a concern. Corrective actions required as a result of monitoring are enforceable pursuant to the terms and conditions of the contract between Area staff and the sub-recipient. If the sub-recipient fails to develop and/or implement a corrective action plan, the Area may withhold reimbursement or terminate the contract.

VIII. REFERENCES

1. ODJFS WIOA Policy Letter 17-02 WIOA Adult, Dislocated Worker, and Youth Programs Performance Accountability
2. ODJFS WIOA Policy Letter 15-08.1 Career Services for Adults and Dislocated Workers
3. ODJFS WIOA Policy Letter 15-10 Youth Program Services
4. 20 CFR § 683.410 and 683.420
5. WIOA Public Law 113-128 Sections 183 & 194