WIOA Sub-Recipient Monitoring Policy



May 2023

Following the NCWorks Commission Policy Statement 06-2022, the High Country WDB will use the following guidance for fiscal and programmatic monitoring of its sub-recipients or service providers receiving funds or contracts under the Workforce Innovation and Opportunity Act (WIOA) or other funds that may be awarded in partnership with the WDB. Monitoring will include Title 1 Adult, Dislocated Worker, Youth, and Center Operations.

The purpose of monitoring is to ensure the integrity of the WIOA system, to review performance, assess compliance with applicable laws, regulations, and policies and identify successful methods and practices that serve to enhance the system through continuous improvement. Funds received through special grants will also be monitored.

Monitoring will be conducted on-going, informally throughout the year and may include spot checks of files, invoices, processes, desk reviews, site visits, and technical assistance meetings or trainings. Issues or concerns related to informal monitoring may be communicated via emails, staff discussions, and staff meetings and should be addressed immediately.

In addition, formal monitoring will be conducted at least annually to include a comprehensive review of programmatic and financial documentation. This review also includes Equal Opportunity policies and procedures as well as an annual review of inventory of all property purchased with WIOA funds costing \$500 or more and having a useful life of one year. Annual monitoring is also conducted by the Division of Workforce Solutions (DWS). With effective and timely resolution, issues identified through monitoring can be addressed before they become audit findings.

Formal monitoring will be documented by written summaries of the programmatic and fiscal reviews along with the completion of the local Administrative/Programmatic/Fiscal Monitoring Guide. Upon completion of annual monitoring, service providers will receive a written summary. Significant findings or repeated deficiencies could result in corrective action or probationary status and may be included in consideration of contract renewals.

Local and state monitoring is not intended to capture all areas of concern but should be used by the service provider to assist in their own internal monitoring and training of staff to ensure that all measures are being implemented to ensure compliance with federal, state and local policies and procedures. The WDB is committed to providing technical assistance during the year to assist in successful implementation and outcomes.

It is expected that staff make use of reports via NCWorks Online to assist in their case management responsibilities related to keying, tracking of customers, and exits. Staff should also reference keying guidelines and other resources provided by DWS located in NCWorks Online under Staff Online Resources, DWS/Commission policy statements, as well as local policies on the WDB website.



Programmatic Monitoring

Annual programmatic monitoring generally includes the following components:

- Review of sampling of files in NCWorks Online to ensure eligibility and data validation, keying expectations, and documentation of service delivery related to customer needs and local policies.
- Redaction of personal identifying information.
- Review of customer employment plans to ensure appropriate goals and updates are made.
- Review keying of outcomes such as credentials and skills gains related to training.
- Review of appropriate activities and activity dates related to appropriate case notes and last date of service.
- Review of appropriate documentation to support expenditures such as case notes, supportive service activities, and scanned documentation related to the expense.

A written summary of file reviews will be provided to the service provider indicating areas to review and address. The service provider should review documentation with staff to address any concerns and corrections. Necessary corrections should be made in NCWorks and written responses are generally due within two weeks.

Fiscal Monitoring

Annual fiscal monitoring generally includes the following components:

- Review of financial and internal monitoring procedures.
- Review of staff salaries, indirect and joint costs, travel expenses, other expenses, and timesheets.
- Review of monthly invoices and financial reports, and WEX reports.
- Review to ensure proper fund codes are selected internally to match participant activities.
- Review of general ledgers, bank reconciliations, chart of accounts.
- Review of award agreement, contracts, budgets, and WIOA compliance.
- Review of participant Individual Training Accounts, work-based Learning activities, supportive services and incentives, and all other documentation related to participant activities.



In addition to the annual fiscal monitoring, invoices and documentation will be reviewed monthly informally for general accountability, and one month from every quarter will be randomly selected by the WDB for a more in-depth review of supportive documentation. Subrecipients should identify an individual in their organization that is responsible for regular ongoing monitoring of financial activities.

If any missing documentation is identified or there are additional questions regarding costs, they will be provided to the service provider in a written summary to review and address. Necessary corrections should be made, and updated documentation of these changes should be submitted to the WDB within two weeks. Subrecipients should refer to the Local Area contract agreement in the event of disallowed costs findings.

NCWorks Operations

Annual review of NCWorks Operations will generally include:

- Review of overall service delivery processes in the NCWorks Career Center between the Operator and Service Provider for an integrated system and the delivery for basic career and training services.
- Review of engagement with community partners and community involvement to assist in service delivery to underserved populations.
- Review and process for staff training (to include diversity, equity, and inclusion) on expectations and procedures related to center certification, NCWorks keying, etc.

It is expected that the Operator and Service Provider will develop a working relationship that fosters excellent customer service for job seekers, employers, and staff through open communication and partnerships.

Reference High Country Equal Opportunity Grievance Procedure High Country Property Management/Inventory Policy Commission Policy Statement 06-2022