

Administrative Policy 6: Monitoring and Oversight  
Review/Revision Index  
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- Revision 1 – Accepted January 17, 2017
- Revision 2 – Accepted August 17, 2017
- Revision 3 – Accepted September 21, 2017
- Revision 4 – Accepted May 17, 2018
- Revision 5 – Accepted January 15, 2019
- Revision 6 – Accepted August 15, 2019
- Revision 7 – Accepted February 20, 2020
- Reviewed February 17, 2022
- Revision 8 – Accepted November 17, 2022

## **WORKFORCE DEVELOPMENT BOARD ADMINISTRATIVE POLICY 6**

### **SUBJECT:**

Monitoring and Oversight

### **I PURPOSE**

The Workforce Development Board (WDB) will conduct monitoring and oversight of program operator activities and those of its subrecipients and contractors in accordance with WIOA Section 107 (d) (8). Monitoring and oversight activities will be conducted by the WDB Director with outcomes reported to the WDB as is appropriate. These activities will be in addition to the following standard on-going monitoring activities:

1. ODJFS WIOA Program Monitoring
2. ODJFS Fiscal Monitoring
3. ODJFS Data Validation
4. **Single** Audit

### **II PROCEDURE**

1. WDB will conduct monitoring and oversight through the completion of the attached procedures.
2. WDB subrecipients and contractors will be monitored on-site at least once during the contract year for compliance with provision of the Act, Regulations, and other appropriate state and local policies.
3. A confirmation of the monitoring will be generated, at minimum, annually to document compliance. Should the review cite findings and observations, the review will recommend a corrective action plan including date of completion.
4. WDB will provide technical assistance as necessary and appropriate to resolve any findings or observations.
5. All completed corrective action plans and relevant follow-up reports will be reviewed by the WDB Director.
6. The Director in consultation with the operator management staff effects the final action as determined from information derived from follow-up reports.

### **III ACTION REQUIRED**

Any clarification needed should be directed to the Board Director

### **IV EFFECTIVE DATE**

Immediately

### **V ATTACHMENT**

WDB Monitoring and Oversight Procedures

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## WDB MONITORING AND OVERSIGHT PROCEDURES

### I. GENERAL

- a. Participate in scheduled operational meetings to ensure that program operator is in compliance with WDB policies, procedures, and strategic vision.
- b. Maintain communication with key program operator staff to ensure performance goals are being met.
- c. Conduct annual performance evaluation of key program operator staff.
- d. Review Equal Employment Opportunity/Affirmative Action (EEO/AA) System and note any perceived deficiencies in the EEO/AA system.

### II FISCAL

- a. Review weekly check register to monitor appropriateness and level of cash disbursements.
- b. Review cash draws prior to CFO submitting to state.
- c. Review overall budget to ensure funding levels are appropriate.
- d. Complete a subrecipient risk assessment on an annual basis.
- e. Complete a subrecipient monitoring based upon the results of the subrecipient's annual risk assessment. Monitoring activities may include eligibility determination, allowable services, allowable costs, internal management systems, procurement, and cost allocation.
- f. Maintain communication with program operator CFO / Fiscal Agent.
- g. Participate in annual State Fiscal Monitoring.
- h. Participate in **the single** audit.
- i. Note any findings and require appropriate written corrective action plan.
- j. Report monitoring results to WDB.

### III. PROGRAMMATIC

- a. Eligibility of Participants - Select a sample of customers and review files to determine:
  - i. Existence of applications and assessments (when applicable).
  - ii. That eligibility for participation was properly documented.
  - iii. That residency requirements, if needed, were properly documented in OWCMS.
- b. Participate in annual State WIOA Comprehensive Monitoring.
- c. Participate in State Data Validation when scheduled.
- d. Review the effectiveness of the area's Rapid Response program according to State policy WIOAPL 15-15.2, Section VIII.
- e. **Review monthly case note report.**
- f. **Review quarterly Comprehensive Case Management and Employment Program participant engagement report.**
- g. Note any findings and require appropriate written corrective action plan.
- h. Report monitoring results to WDB.

### IV. ON-SITE MONITORING FOR RFP PROGRAM SERVICES

- a. Deliverables specified in the RFP will be reviewed to ensure performance is being met.
- b. Each entity reviewed will receive a letter outlining the outcome of the monitoring within 30 days of said review.

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- c. Should the review cite findings and observations, the review will recommend a corrective action plan including date of completion.  
The on-site review of deliverables may be taken into consideration when assessing if contract renewal is appropriate.