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Ohio Valley Employment Resource

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Ohio Valley Employment Resource Policy Letter No. 2-16

Board Notification of Program Progress and Monitoring

Purpose

The purpose of this policy is to ensure the integrity of the program and inform the Board. Accurate and timely dissemination of progress to the Board empowers the Board to make data driven decisions to improve program progress. The monitoring process ensures that the federal award is used for authorized purposes, in compliance with federal statutes, regulations, and the terms and conditions; and that performance goals are achieved.

I. Effective Date with WDB and COG motion #s

6-19-17; COG motion 32-16; WDB motion 30-16

Revised: COG motion 16-22, 2/6/23; WDB motion 15-22, 2/6/23: to add language to clarify a 30-day time limit on data entry for all case notes and services in Aries system

II. Background

Oversight of the WIOA Title I programs is the joint responsibility of the Workforce Development Board and Council of Governments. As the fiscal agent and staff to the board, Ohio Valley Employment Resource works throughout the program year with the program operators to collect, review and disseminate data. The culmination of this oversight is the monitoring.

WIOA regulation § 683.410 (a) states that, "Each recipient and subrecipient of funds under title I of WIOA must conduct regular oversight and monitoring of its WIOA program(s) and those of its subrecipients and contractors as required under title I of WIOA, as well as under 2 CFR part 200, including 2 CFR 200.327, 200.328, 200.331, and Department exceptions at 2 CFR part 2900, in order to:

- (1) Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in WIOA and the regulations in this part;

- (2) Determine whether there is compliance with other provisions of WIOA and the WIOA regulations and other applicable laws and regulations;
- (3) Assure compliance with 2 CFR part 200; and
- (4) Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of sec. 188 of WIOA, including the Assistive Technology Act of 1998 (29 U.S.C. 3003).

III. Policy Implementation

To carry out the charge given by WIOA regulation § 683.410 (a), the fiscal agent and staff to the boards is in regular communication with the WIOA title I program operators, both collecting and disseminating data. The data gathered is shared with the boards throughout the program year.

A. By the Area

Types of Review and Monitoring

Review & Report

Performance review will be presented for each of the Council of Governments and Workforce Development Board meetings. This will be an ongoing process designed to provide management with current performance data.

Expenditure review report by county and area for each Council of Governments and Workforce Development Board meetings. This will be generated to provide management with cumulative expenditures and percent of monies spent in all WIOA title I programs.

One-stop participant reports will be reviewed by county and area for each Council of Governments and Workforce Development Board meetings. This will be generated to provide management with the level of usage and services delivered by the one stop system.

Fiscal Agent and Staff to the Board line item detail review of expenditures will be provided for each Council of Governments meeting. This will be generated to provide management with line detail expenditures and percent of monies spent.

Formal Review - the formal review is a comprehensive review of administrative, fiscal and programmatic records, site review, corrective action and follow-up. The review is performed at least annually or per contract, whichever comes first.

Review & Monitoring

Monitoring shall be accomplished by on-going and periodic review of WIOA programs and the local area one stop system that the Workforce Development Board is charged to oversee. This shall be accomplished by desk review and on-site/virtual visits. This includes all components of the program: administrative, fiscal and operational facets. Monitoring will be conducted on all WIOA providers, contractors and institutions providing services to WIOA participants.

Desk review of contract, proposal modifications and participant data is performed throughout the program year, as data is received and provides details and a basis of understanding for the monitor.

On-site/virtual review will be scheduled at a mutually agreeable time with the provider. An entrance interview between the authorized representative and the monitor will be

offered. Administrative, programmatic and/or fiscal monitoring will be conducted, using the standard tool(s).

Authoritative Pronouncements

The monitor shall monitor to the following, as applicable:

OMB Circulars as codified by DOL

WIOA Act & Federal Regulations

WIOA Performance Measures

Ohio Revised Code

Administrative Procedure Manual

State/Local Board WIOA Policy

Workforce Inventory of Education and Training List – for approved trainers

State In-demand List – for training fields

Local Agency Policy

Individual Contract

And any other legal authoritative guidance available at the time of monitoring that would apply to the situation being monitored.

When two policies apply; all terms in both policies apply with the stricter of the two policies being the relevant limit.

Structure of Area Monitoring

The monitor shall perform a desk review of the provider by examining all program materials related to the visit such as contract, proposals, previous monitoring reports and audits, corrective action plans, etc.

The on-site review shall be performed to verify system integrity and/or identify areas where technical assistance may be needed. Interviews may be conducted with participants, employees, and contractors. The monitor shall review back-up documentation such as invoices and participant files.

The on-site monitoring coverage will be based on the risk assessment, but at a minimum review 25% or 4 case files of each program type. If a participant is dual enrolled, the file may count for one or all programs. The monitoring guide, Attachment A, will be used as the monitoring tool.

A post desk review will generate a report of the site visit and will be reviewed by the Ohio Valley Employment Resource Director and Workforce Development Board. If corrective action is needed, a corrective action response will be requested within 10 days.

Schedule of Monitoring Activities

The Area shall conduct the subrecipient risk assessment review annually. The risk assessment starts the monitoring cycle. The assessment identifies any existing risk factors; and determines the level of monitoring that shall occur. The risk assessment is completed on Attachment B or similar form.

At a minimum, compliance, programmatic, financial, and administrative monitoring will be done on an annual basis. The administrative section may be shortened on subsequent visits, due to lack of change in organizational structure.

Monitoring may be done by section: fiscal, program; or comprehensively. An exit interview with authorized personnel, including areas requiring corrective action will conclude the on-site review.

Monitoring Reports

All monitoring reports will include technical assistance (if needed), recommendations and address corrective action taken. The attached schedule will track the session's progress, Attachment C.

Monitoring reports are usually prepared and put on file within 30 days of a visit to an agency or service provider. The agency monitored will receive a copy of the report and required corrective action (if needed). If corrective action is required, the agency monitored must submit within 10 days.

Corrective Action Responses

Corrective Action responses must contain remedies to the issue and will be reviewed by both the Ohio Valley Employment Resource Director and the Workforce Development Board. Corrective action requests are made when discrepancies are noted and corrective action responses are requested from the agency within 10 days.

After submission of the corrective action plan, the monitor will review its feasibility. If the plan is satisfactory, the monitor will accept it and will close the monitoring report and issue an acceptance letter. If unsatisfactory, the monitor will determine the required action to be taken. The response will be delivered and filed within 10 days of the response's receipt based on the corrective action plan proposed.

Follow-up visits may be conducted usually within 30 days of the corrective action plan's approval. All follow-up visits are documented and attached to the original monitoring report.

All monitoring reports, corrective action responses and follow-up will be made available to the WIOA Providers, the Workforce Development Board, Council of Governments, State monitors and auditors, and other appropriate staff.

B. By the Local County Programs

1. WIOA Title I formula programs (Adult, Dislocated Worker and Youth)

To complete the charge given by WIOA regulation § 683.410 (a) above, the local WIOA Title I programs, will monitor all local contracts. Local contracts include: OJTs, work experience and subcontract of any/all of the fourteen youth elements.

The OJTs and work experience monitoring will consist of, at a minimum:

An initial assessment of the employer qualifications and work environment for health and safety concerns.

Later monitoring is required to assess the participant's progress and the continued health and safety of the work environment. This is ideally completed no later than the midpoint of the contract.

The youth elements monitoring will consist of, at a minimum:

An initial assessment of the contractors' qualifications, understanding of the program and the associated laws/regulations/policies that apply to the element(s) contracted.

Later monitoring is required to assess the contractor's progress and the continued compliance with program requirements. This is ideally completed no later than the midpoint of the contract.

All Data Entry for all monitoring (ie. Case notes, services, reports, etc.) will need to be completed within a 30 day time frame of the occurrence.

2. One-stop Operator monitoring of the one stop system

The Workforce Development Board has competitively procured the one stop operator as required by WIOA. The one stop operator is contracted to ensure the health and safety of the one stop centers and to ensure that the memorandum of understanding that governs the one stop system is functioning as agreed by the one stop partners.

The one stop operator will monitor the one stop system, both the comprehensive site and the satellites, at a minimum annually, to ensure they are in compliance.

The one stop operator's report of monitoring will be issued to the Workforce Development Board for review at formal meeting.

IV. Technical Assistance

At the county level, it is the county's discretion to contact the state directly or to start with the Area Executive Director. However, regardless of choice, the Area Executive Director must be consulted, whether directly or by cc: on email, so that the WDB is informed and engaged in local implementation.

V. References

WIOA Act & Regulation
Omni Circular 2 CFR part 200
State WIOAPL 15-13 Work Experience for Youth
Ohio Revised Code
Administrative Procedure Manual
State WIOA & CCMEP Policy