



# Mississippi Valley Workforce Development Board

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## Monitoring Policy

**Approved Date:** January 11, 2021

**Effective Date:** January 1, 2021

**Amended Date:** December 6, 2022

### Background

The Mississippi Valley Workforce Development Board (MVWDB) on behalf of the Chief Lead Elected Official (CLEO) for the Mississippi Valley Workforce Area (MVWA), must conduct monitoring of all contracts at least annually, or for contracts lasting less than one year, once during each contract term for financial and programmatic compliance.

MVWDB must also ensure that the use, management, and investment of funds for workforce development activities are consistent with 2 CFR 200 and maximize performance outcomes under section 116 of the Workforce Innovation and Opportunity Act (WIOA).

### MVWDB Primary Responsibilities

Per IWD Chapter 9 Section: 2.1 the MVWDB must conduct oversight, which may include, but is not limited to:

- Administration and Governance
- Workforce Development Program Delivery
- Fiscal Management
- Performance and Reporting Management
- Additional review areas, as applicable

### Monitoring Schedule

All Contracts shall be monitored by the staff of the MVWDB and/or fiscal agent for each program they operate at least annually for all WIOA-Related and certain non-WIOA-related operations in the MVWA.

The monitor will work with the sub-recipient to schedule a monitoring timeline that meets the needs of all parties involved.

Communications related to monitoring will be initiated at least thirty (30) days but no more than forty-five (45) days before the start date of the monitoring whenever possible.

Once monitoring has started the process should be completed within sixty (60) days unless extenuating circumstances arise.

The MVWDB reserves the right to conduct unscheduled monitoring in conjunction with or in response to investigations of misfeasance and/or malfeasance or previous monitoring findings.

### **On-Site Monitoring**

MVWDB will conduct on-site monitoring visits on an annual basis. On-site monitoring visits may be conducted as a standalone review or incorporated into other monitoring reviews.

Onsite monitoring visits may include but are not limited to:

- Entrance and exit conference with Title I leadership and staff.
- A tour of the American Job Center
- Participant file reviews
- Interviews with contractors, customers, and employers who received services, center staff, and One-Stop Operator

### **Responsible Representatives**

Designated board staff or monitoring staff will perform the programmatic monitoring of the sub-recipients, or designee, along with oversight of the fiscal agent.

The fiscal agent staff will be responsible for the oversight and monitoring of the sub-recipient's fiscal operations.

### **Oversight Methods**

MVWDB will develop written oversight tools that assist the Local Area in conducting a thorough review of programs and activities. The varying requirements of each funding stream involved will be considered when designing the tools and determining the most effective activities to use. The tool used for each oversight activity will be included in the final monitoring report. Examples of oversight tools may include, but are not limited to:

- Risk Assessment Tool
- Monitoring Review Guide
- Corrective Action Tracker
- Correction Action Plan Template
- Monitoring Report Template

### **Monitoring Requirements**

Programmatic, fiscal, and operational monitoring will be conducted to measure compliance with WIOA regulations, Iowa Workforce Development (IWD), and local policies.

Monitoring will include a comprehensive examination of compliance issues cited in prior state and local reviews and the determination of where corrective measures were taken to address and resolve those issues.

In accordance with IWD policy Chapter 9 Section: 2.2.2 program monitoring may include onsite reviews of policies, plans, and procedures governing all segments of the contracts program activities and operations at least once during the program year.

Additionally, monitoring may include reviewing services to participants for program accountability and to ensure sub-recipients perform by the terms, conditions, scope of work, and specifications of their contracts.

Participant's files may also be reviewed as part of program monitoring to include but are not limited to:

- Participant's eligibility and/or priority for the specific programs and services
- Orientation to services
- Signed acknowledgment from the participant that notification of complaint and grievance rights and procedures were received
- Justification for the provision of Individualized Career Services or Training Services
- Method of assessment
- Employment planning
- Individual Training Accounts
- Appropriateness and accuracy of participant payments (i.e., supportive services)
- Appropriate data entry and posting of outcomes, including attainment of a degree or certificate and any supplemental employment data
- Any other applicable Data Elements

A random sampling of files from every funding stream will be selected to test eligibility and compliance in every funding stream for which there is a contract with MVWDB. Programs funded by other Grantors will follow the monitoring requirements in the respective scope of work.

The monitoring staff may also review one or more personnel records of individuals paid through contracts with the MVWDB. The purpose of this review would be to ascertain if subcontractor staff:

- Possess the education and experience to perform the responsibilities of the position.
- Expend the time on contract-related activities charged against the contracts being monitored.
- Have signed complaint and grievance procedures on file.

### **Work Based Learning**

Monitoring staff will include work-based learning monitoring in the annual required monitoring. The purpose of this is to:

- Evaluate compliance with the contract terms
- Help solve any concerns between the WIOA service provider (s), employer (s), and/or work-based learning participant

- Verify that the program participant is receiving the training, education, and other services contracted for in the agreement
- Verify that the participant is not required to engage in activities prohibited by WIOA

The monitor may also review the participant's attendance records to ensure that the participant is attending and succeeding in the training, and review employer records to assure that the participant is receiving proper wages and that the employer is withholding taxes and paying worker's compensation.

### **EEO and ADA Compliance**

Monitoring staff may survey the subcontractor's hiring practices, promotion practices, facilities, and outreach and intake procedures to ascertain the sub-recipient's compliance with the Equal Employment Opportunities and the Americans with Disabilities Act.

### **Fiscal Monitoring**

At least once during each program year, the MVWDB fiscal agent staff will conduct an on-site financial monitoring review of each sub-recipient's financial procedures and systems.

Monitoring will be conducted to comply with IOWA Section 184 (a) (4) [29 U.S.C. 3244 (a) (4)], annual MVWDB agreements, and 2 CFR Part 200 and Part 2900.

The financial monitoring will ensure the adequacy of internal controls and the reliability of the sub-recipient's financial management systems as they related to the administrative sub-award. This monitoring review will ensure that the sub-recipient meets the terms and conditions of the sub-award and the fiscal goal or requirement, and that amounts reported are accurate, allowable, and supported by documentation and properly allocated.

The fiscal agent will consult with the board before issuing any monitoring notifications to coordinate activities to be monitored.

The monitoring report will result in a written report to MVWDB identifying findings, areas of concern, approved corrective action plans, and recommendations.

The monitoring shall be completed using a standardized monitoring instrument, which may be customized to meet special contract provisions.

The review may include, but will not be limited to, reviewing the following processes and documentation, and will be adjusted as needed:

- Financial Reporting
- Internal controls
- Source documentation
- Cost allocation/indirect costs
- Cash management
- Procurement and inventory review
- A regular examination of expenditures to test transactions against cost categories and cost limitations

- Audit resolution/management decision
- An examination to determine if program income exists, is being accounted for a reported by the applicable requirements
- A review and interview to ensure that staff is following the proper guide for determining costs applicable to WIOA (OMB Circular) and WIOA procurement guidelines

**Note:** Depending on the finding or concern and the Risk Assessment, MVWDB may elect to monitor all or specific areas more frequently. Subsequent monitoring will review prior financial monitor reports and investigate any prior findings and their resolution.