



SUBJECT: WORKFORCE CENTRAL MONITORING AND OVERSIGHT REQUIREMENTS POLICY

POLICY NUMBER: #14-2004-3425 –Revision 1

REVISION EFFECTIVE DATE: December 20, 2012

Note: This policy supersedes and replaces the Monitoring, Oversight, Audit Resolution, and Debt Collection Policy # 14-2004-3425 dated September 30, 2004. Audit Resolutions and Debt Collection policies will be addressed in separate policies.

Grantees, sub-recipients, and contractors funded under the Workforce Investment Act (WIA), whether in whole or in part, must abide by the Workforce Investment Act of 1998, the WIA Regulations, all applicable Office of Management and Budget (OMB) circulars, state requirements in laws and rules (Revised Code of Washington and the Washington Administrative Code), Office of Financial Management (OFM) policies and the Washington State WIA and WorkSource System policies.

PURPOSE:

The Tacoma/Pierce County Workforce Development Council (WDC) must have a comprehensive monitoring plan and must continuously monitor all grant-supported activities in accordance with the uniform administrative requirements at Title 29 Code of Federal Regulations (CFR) parts 95 and 97, for all entities receiving Workforce Investment Act (WIA) funds. Local monitoring will test compliance with the appropriate requirements for grants and agreements for each type of entity receiving the funds.

BACKGROUND:

In accordance with WIA (20 CFR Part 667.410), each recipient and subrecipient must conduct regular oversight and monitoring of its WIA activities and those of its subrecipients and contractors in order to:

- 1) Determine that expenditures have been made against the cost categories and within the cost limitations specified in WIA and the regulations;
- 2) Determine whether or not each recipient and subrecipient comply with other provisions of the Act and regulations and other applicable laws and regulations; and
- 3) Provide technical assistance as necessary and appropriate.

POLICY

In addition to regular monitoring of its own activities, WorkForce Central (WFC) on behalf of the Tacoma-Pierce County WDC, is responsible for continuously monitoring its subrecipients of funds under WIA. As such, WFC Performance and Compliance Department staff, WorkForce Central Fiscal Department staff, WFC Equal Opportunity Officer and outside independent monitoring contractors will have full access to and the right to examine and copy records that are applicable to the award of the federal funds administered by the WFC. The WFC fulfills statutory responsibility described in Section 184 of WIA as outlined below:

- The WFC has established and adheres to appropriate systems for award and monitoring of agreements with subrecipients. The system contains acceptable standards for accountability.
- The WFC enters into written agreements with subrecipients that establish clear goals and obligations in terms that are easy to understand.

- The WFC acts with due diligence to monitor the implementation of subrecipient agreements including carrying out monitoring activities at reasonable intervals.
- The WFC takes prompt and appropriate corrective action upon becoming aware of any evidence of violation of WIA, associated regulations, state policies, WFC policy and subrecipient agreements.

At a minimum, the WFC compliance review will target the following risk areas:

- Compliance with WIA federal regulations (including OMB Circulars A-87 and A-122), state policies and procedures. This includes appropriate reviews of procurement, performance, and resolution of audit findings including those of subrecipients in addition to other areas for review [Section 667.410(a) (1) and (2)].
- Expenditures: On-site reviews of financial records and the source documents, such as, invoices, receipts, vouchers, cancelled checks, time sheets.
- Eligibility: On-site reviews of programmatic records, such as, participant files including paper and computer case management files, eligibility and supportive services documentation.
- For compliance with WIA eligibility requirements of services and support payments being received, the WFC will ensure subrecipients and contractors verify attendance and satisfactory progress for participants who are enrolled in training.

Monitoring also includes, but is not limited to:

- Submitting an annual monitoring plan to the Employment Security Department, WorkSource Standards and Integration Division (WSID) as required under WIA Title I-B state policy 3425, effective date July 1, 2000. See Attachment 1, WFC Monitoring Plan.
- Conducting annual onsite monitoring of subrecipients/contractors in accordance with the WFC monitoring plan. WFC onsite monitoring would include a review of subrecipient/contractor:
 - Financial records and sources documents such as invoices, receipts, vouchers, cancelled checks, and employee time sheets.
 - Programmatic records such as participant files, paper/computer case management files, eligibility and supportive services documentation.
 - Compliance with WIA, federal regulations (such as OMB Circulars A-87 and A-122), state and local policies, and the local strategic plan.
- Reviewing reports submitted by subrecipients/contractors including Service, Knowledge and Information Exchange System (SKIES) data as well as financial data to monitor planned versus actual performance and expenditures and equity in service delivery.
- Reviewing with subrecipients/contractors any exceptions, issues, or lack of internal controls found.
- Providing ongoing training and technical assistance to subrecipients/contractors as requested.

- Mutually agreeing upon written plans for corrective action (if appropriate).
- Writing formal reports of results of reviews. WFC will issue a Preliminary Monitoring Report within 90 days of the completion of on-site monitoring visits. Any findings or questioned costs and resolution processes would be addressed in the report. The sub-recipient will have 30 days from the date of the WFC initial report to respond to Findings identified in the report. The sub-recipient may request an extension if it is unable to respond within the 30-day period. WFC will issue a Final Response within 30 days following the receipt of the sub-recipient's response.

Areas of Program Management and Operation to be monitored:

The WFC will perform onsite monitoring of program management and operation of subrecipients/contractors in the following areas:

- WIA Adult Program
- WIA Dislocated Worker Program
- WIA Youth Program
- Grievance procedures
- Internal controls
- WIA Individual Training Accounts
- SKIES
- Personnel, EEO, and Nondiscrimination
- Property Management

REFERENCES:

- The Workforce Investment Act (WIA) of 1998 (Public Law 105-220)
- The U.S. Department of Labor/Employment and Training Administration, 20 CFR, Part 652, et.al. WIA; Final Rules (Ref: Sections 667.400 through 667.860)
- 29 CFR Part 37, Implementation of the Nondiscrimination and Equal Opportunity Provisions of WIA; Final Rules
- 29 CFR Part 95 Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non Profit Organizations et cetera
- 29 CFR Part 97 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments
- WIA System Policies; WIA Title I-B/ARRA; General Administration; WIA Policy Number 3425; Effective July 1, 2000.

Direct Inquiries to:

WorkForce Central
 3650 South Cedar Street
 Tacoma, WA 98409-5714
 Phone: 253-472-8094 or 1-800-999-8168

ATTACHMENT 1



SUBJECT: WFC MONITORING PLAN
EFFECTIVE DATE: DECEMBER 20, 2012

Note: This monitoring plan supports the WFC Monitoring and Oversight Requirements Policy #14-2004-3425 Revision 1, 12/20/12

Purpose: The Tacoma/Pierce County Workforce Development Council (WDC) must have a comprehensive monitoring plan and must continuously monitor all grant-supported activities in accordance with the uniform administrative requirements at Title 29 Code of Federal Regulations (CFR) parts 95 and 97, for all entities receiving Workforce Investment Act (WIA) funds. Local monitoring will test compliance with the appropriate requirements for grants and agreements for each type of entity receiving the funds.

WFC MONITORING PLAN:

WFC Monitoring Team: WorkForce Central's on-site WIA monitoring team is a collaboration of staff from WFC's Fiscal Department, WFC's Contracts and Performance Department, WFC's EO Officer and outside independent contractors when needed.

WFC Monitoring Scope of Work: WorkForce Central monitors WIA funded programs to ensure compliance with WIA Title 1B; federal and state requirements, applicable laws and regulations; identify technical assistance needs; follow up on previous findings; and ensure the sub-recipient is meeting performance goals and objectives. In addition, our monitoring efforts identify applicable operational changes and ensure that internal controls over financial management and accounting systems are adequate to account for program funds in accordance with state and federal programs.

WorkForce Central monitors its own Adult, Dislocated Worker and Youth programs as well as sub-recipients of WIA funds.

WFC Monitoring Approach: WorkForce Central monitors its WIA service providers in a variety of ways to include a combination of periodic desk-top reviews of SKIES data entry, monthly review of performance outcomes and invoices, quarterly review of performance outcomes, and yearly on-site fiscal and participant file reviews.

Upon completion of any monitoring approach, recipients are recognized if performing well and notified if areas of concern have been identified. Providers are notified in writing of the specific issue, given specific timeframes and instruction for addressing the concerns and if needed, WorkForce Central will conduct a follow up review to ensure the corrections have been implemented.

Fiscal monitoring includes the review of:

- Personnel functions performed/Individuals performing them
- Budget system
- Cost allocation
- Cost classification/Allowable costs
- Financial Management System
- Cash Management
- Income
- Procurement
- Equipment Management
- Audits
- General Operational Information
- Internal controls

Program monitoring includes:

- Eligibility (to include file reviews to ensure all applicable WIA eligibility and programmatic documentation is in the participant file)
- Grievance procedures
- ITA's (Individual Training Accounts)
- Support Service justification
- Management Information Systems (SKIES)
- EEO and Non-discrimination

**WFC Monitoring
Schedule :**

- Desk top reviews are conducted several times a month: every two weeks when Provision Reports are disseminated to staff; when SKIES case records are randomly selected for review several times a month; and when monthly invoices are submitted for reimbursement.
- Every six weeks, the WFC WIA Youth Performance Team convenes to review the performance of the individual contractors and the Consortium's progress towards contracted obligations. The Performance Team is comprised of Youth Council members, Youth Consortium staff and WFC Performance and Compliance Department staff.
- Roll-up performance reports are disseminated to staff on a monthly basis and disseminated to Youth Council members on a quarterly basis.
- Annual on-site monitoring is conducted during the contract period. Preliminary Monitoring Reports are issued 90 days of the completion of on-site monitoring visits.

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