

Policy Letter #7

TO: All Staff

FROM: Matthew Fowler, Director

SUBJECT: Monitoring Policy

BACKGROUND

The Mid-Carolina Workforce Development Board provides oversight and accountability of the Workforce Innovation and Opportunity Act (WIOA) funded activities for Cumberland, Harnett, and Sampson County. This Monitoring Policy outlines the procedures for reviewing Workforce Innovation and Opportunity Act (WIOA) funded activities, identifying monitoring trends, recommending best practices and process improvement strategies, and initiating actions to achieve negiogated programs goals. The responsibility for monitoring will be that of the Mid-Carolina Workforce fiscal and programmatic staff, with oversight from the Director.

POLICY

WIOA activities and services, to include program administration and fiscal management practices, will periodically be monitored/evaluated to ensure compliance with WIOA, DOL regulations, NCWorks Commission Policy Statements and DWS Operational Guidance, Mid-Carolina Workforce Development Board policies and procedures, and the terms of any approved contracts/agreements under the purview of the Mid-Carolina Workforce Development Board. Performance will be monitored monthly to include on-site visits. The state's monitoring guide will be used as a framework for all local area monitoring activities.

ACTION:

Monitoring will be conducted by the Mid-Carolina Workforce Program Staff. It is the expectation of Service Providers to conduct their own internal montoring as well.

The scope of monitoring will include developing and revising monitoring guides and instruments, maintaining contact with state monitoring personnel, reviewing state and federal monitoring policies and procedures, conducting monitoring visits, conducting follow-up visits due to non-compliance with WIOA regulations, and providing technical assistance to Subrecipient Staff.

Programmatic Monitoring may include, but is not limited to, review of:

- 1. Eligibility determination and verification, to include proper funding and program determination.
- 2. All documents and agreements are properly signed and dated by all applicable parties and uploaded (scanned/labeled/linked) timely and appropriately in NCWorks. (*Mid-Carolina Workforce Development Board defines timeliness as 14 days from the date of the action.*)
- 3. Proper redaction of all documents uploaded (scanned) in NC Works.
- 4. The Objective Assessment (OA), Individual Employment Plan (IEP) / Individual Service Strategy (ISS), and the WIOA application are completed, signed, scanned, and linked appropriately in NC Works to include the EEO section
- 5. Applicable services, related case notes, verification documents, self-attestations, and service codes are compliant within NC Works
- 6. Contract compliance review of contracts (e.g. Work Experience (WEX), Onthe-Job Training (OJT), Incumbent Worker Training (IWT), National Dislocated Worker Programs, and all Special Grants).
- 7. All timesheets, attendance records and mileage reimbursement, ITA and supportive services vouchers, etc., including supporting applicable documentation are correctly completed, calculated, signed, dated, and scanned timely in NCWorks, with applicable case notes.
- 8. Worksite Review of all Work Based Learning (OJT WEX IWT) worksites
- 9. Measureable Skills Gains, Credential Attainments, and Follow-ups are documented appropriately in NCWorks.
- 10. Compliance with all Local, Federal, and State Guidance.

Mid-Carolina Workforce Staff will provide a report that includes findings, areas of concern, and recommendations with a deadline for response and any applicable corrective measures.

Sampling Review:

Random selection of WIOA participant records will be selected and used to review compliance with Local, State, and Federal Guidance. The review may include a small percentage of records which will be conducted on a monthly basis. This will include a review of the requirements under the Workforce Innovation and Opportunity Act (WIOA) guidelines and may include, in part or whole, a review of all pertinent files, contracts, reports, records, etc.

Fiscal Monitoring:

Fiscal monitoring is conducted to ensure an adequate system of financial record keeping, documentation of problems, and recommendations for corrective action. This section of a monitoring may include, but is not limited to, the following:

- Review of invoices
- Review of Work-Based Learning activities to ensure compliance with

contract/agreement hours and budgeted amounts

- Financial and Administrative Systems
- Accounting and Fiscal Management
- Budget
- Payments and Disbursements
- Internal Controls
- Financial Reporting

Corrective Measures:

The Service Provider will receive a report that includes findings, areas of concerns, and recommendations with a deadline for response and any applicable corrective measures. The timeframe for response and applicable corrections are within ten (10) working days from receipt of the monitoring summary. Any concerns/trends will be used to identify areas for improvement related to training and technical assistance.

Non-Compliant Actions:

The Program Analyst will notify the Mid-Carolina Workforce Director and all involved parties within five (5) working days after the required response due date of any non-compliant action with regard to corrective measures.

Attachment A: Monitoring Schedule

Creation Date July 2022

MID-CAROLINA WORKFORCE & TALENT DEVELOPMENT	Mid-Carolina Monitoring Schedule
Planned Time Period	Area of Review
July through September	Year End Compliance Review from prior program year WIOA Title I File Review & Quarterly Report
October through December	One-Stop Career Center Onsite Visits Service Provider Performance Review WIOA Title I File Review & Quarterly Report
January through March	Equal Opportunity/American Disabilities Act Compliance Monitoring WIOA Title III (Wagner-Peyser) Review Partner & MOU Compliance review WIOA Title File Review & Quarterly Report
April through June	WIOA Program Performance review Property Management/Asset Review One-Stop Career Center Onsite Visits WIOA Title I File Review & Quarterly Report