Policy Letter #7

TO: **All Staff**

FROM: **Samantha Wullenwaber, Director**

SUBJECT: **Monitoring Policy**

PURPOSE

This policy establishes a comprehensive monitoring framework for Workforce Innovation and Opportunity Act (WIOA)–funded activities administered within the Mid-Carolina Workforce Development Board (Mid-Carolina WDB) local area. It outlines the procedures used to ensure compliance with federal, state, and local regulations; promote accountability for public funds; identify monitoring trends; recommend best practices and process improvements; and support the achievement of negotiated program performance goals.

BACKGROUND

The Mid-Carolina WDB provides oversight and accountability for WIOA-funded workforce development activities within Cumberland, Harnett, Montgomery, Moore, and Sampson Counties. Monitoring activities are designed to ensure that programs and services funded under WIOA are delivered in accordance with federal statutes, regulations, state policy guidance, and local workforce development policies.

The responsibility for monitoring WIOA-funded activities rests with the Mid-Carolina WDB Fiscal Coordinator and Compliance Monitors, with overall oversight provided by the WDB Director. Monitoring activities support continuous improvement, promote effective service delivery strategies, identify operational deficiencies, and strengthen program performance outcomes.

The Mid-Carolina WDB's monitoring system is designed to:

- Provide annual on-site monitoring reviews the WDB to ensure compliance with 2 CFR §200, as required by WIOA Section 184(a)(3).
- Ensure that established policies supporting program quality and performance outcomes align with WIOA objectives and regulatory requirements.
- Determine whether subrecipients demonstrate substantial compliance with WIOA program requirements.
- Evaluate compliance with the Local Workforce Development Plan and assess progress toward addressing identified deficiencies, as required under WIOA Section 108(e)(1).
- Ensure compliance with nondiscrimination, disability, and equal opportunity requirements outlined in WIOA Section 188, including provisions of the Assistive Technology Act of 1998 (29 U.S.C. 3003).
- Monitor subrecipient activities to ensure that subawards are used for authorized purposes and comply with federal statutes, regulations, and the terms and conditions of the award, while also evaluating progress toward performance goals.

Monitoring activities also provide opportunities to identify innovative practices and strengthen

partnerships among workforce system partners to support continuous improvement and high-quality service delivery.

ACTION

Monitoring Structure

The Mid-Carolina WDB Fiscal Coordinator and Compliance Monitors will conduct monitoring activities across three primary review areas:

1. **Administrative and Financial Management Review**
   Administrative and financial monitoring evaluates the policies, procedures, and operational practices of subrecipients to ensure compliance with applicable federal and state legislation, regulations, policies, and guidance, including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200).

   This review may include:
   - Administrative and financial policy review
   - Subrecipient oversight practices
   - Document review and sampling
   - Compliance with applicable federal and state regulations
   - Compliance with Office of Management and Budget (OMB) Uniform Guidance

2. **Fiscal Monitoring**
   Fiscal monitoring ensures that subrecipients maintain appropriate financial management systems and documentation and comply with financial accountability requirements.

   Fiscal monitoring activities may include review of:
   - Invoices and financial documentation
   - Work-Based Learning activities to ensure compliance with contract hours and budget allocations
   - Financial and administrative systems
   - Accounting and fiscal management procedures
   - Budget management and expenditure tracking
   - Payments and disbursement processes
   - Internal controls
   - Financial reporting practices

   Fiscal monitoring also identifies potential issues, documents findings, and provides recommendations for corrective action when necessary.

3. **Programmatic Monitoring**
   Programmatic monitoring evaluates participant services and program implementation to ensure compliance with WIOA requirements and applicable federal, state, and local policies.

   Programmatic monitoring may include review of:

- Eligibility determination and verification, including appropriate program and funding source identification
- Proper completion, signature, and timely upload of all required documentation within NCWorks Online
- Compliance with document redaction requirements
- Completion and documentation of the Objective Assessment (OA), Individual Employment Plan (IEP) or Individual Service Strategy (ISS), and WIOA application, including Equal Employment Opportunity (EEO) documentation
- Case notes, verification documents, service codes, and self-attestations within NCWorks Online
- Contract compliance for Work-Based Learning and other program agreements, including:
    - Work Experience (WEX)
    - On-the-Job Training (OJT)
    - Incumbent Worker Training (IWT)
    - National Dislocated Worker Programs
    - Special grant-funded activities
- Timesheets, attendance records, mileage reimbursement requests, Individual Training Account (ITA) vouchers, supportive service vouchers, and supporting documentation
- Worksite reviews for Work-Based Learning activities (WEX, OJT, IWT)
- Documentation of Measurable Skills Gains, Credential Attainments, and Follow-Up services within NCWorks Online
- Compliance with all applicable local, state, and federal guidance

For monitoring purposes, the Mid-Carolina WDB defines timely document upload as within fourteen (14) days from the date of the action.

Monitoring activities will include the development and revision of monitoring guides and instruments, maintaining communication with state monitoring personnel, reviewing applicable state and federal monitoring policies and procedures, conducting monitoring visits, and conducting follow-up visits when non-compliance with WIOA regulations is identified. Monitoring efforts will also include providing technical assistance to Subrecipient staff to support compliance and program improvement.

Upon completion of monitoring activities, Mid-Carolina WDB staff will issue a report outlining findings, areas of concern, and recommendations, along with a specified deadline for response and any required corrective actions.

Monitoring Reviews

Monitoring reviews will include random selection of participant files to assess compliance with local, state, and federal program requirements. Reviews may be conducted monthly using a small sample of participant records.

Monitoring activities may include review of:

- Participant files

- Contracts and agreements
- Financial records
- Program reports
- Administrative documentation

Compliance Monitors may utilize remote technology to conduct file reviews, performance reviews, and data analysis. On-site monitoring visits may also be conducted at NCWorks Career Centers and may include:

- Career Center walkthroughs
- Staff interviews
- Observation of service delivery

One-Stop Operator (OSO) Monitoring

In accordance with Training and Employment Guidance Letter (TEGL) No. 16-16, the OSO is responsible for coordinating and facilitating the integrated service delivery system within the American Job Center (NCWorks Career Center).

The One-Stop Operator will oversee:

- Facilitating integrated partnerships among workforce system partners
- Implementing operational policies that support integrated service delivery, communication, and case management
- Organizing services by function when permissible under program authorizing statutes
- Supporting coordinated staff training and capacity-building efforts

The Mid-Carolina WDB will monitor the OSO contracts at least annually to ensure compliance with:

1. WIOA and WIOA regulations
2. 2 CFR Part 200
3. Nondiscrimination and equal opportunity requirements under WIOA Section 188, including the Assistive Technology Act of 1998

Compliance Monitors will utilize written monitoring tools and procedures to assess performance and contract compliance.

Service Provider Response

Following the completion of a monitoring review, service providers will receive a monitoring report outlining:

- Findings
- Areas of concern
- Recommendations for improvement
- Required corrective actions, if applicable

Service providers must respond to the monitoring report within thirty (30) working days from receipt of the monitoring summary. Responses must address corrective actions and provide documentation demonstrating resolution of identified issues.

Monitoring results may also be used to identify system-wide trends and guide training and technical assistance efforts.

Non-Compliant Actions
If corrective actions are not completed within the established timeframe, the Compliance Monitor will notify the Mid-Carolina WDB Director and all relevant parties within fifteen (15) working days following the response due date regarding the non-compliance.

Additional corrective actions or enforcement measures may be implemented as necessary to ensure compliance with WIOA requirements.

REFERENCES
CPS 06-2022, Change 2 Workforce Innovation and Opportunity Act (WIOA) Monitoring-Oversight of Local Area WDBs
CPS 06-2022, Change 2 Attachment 1 – Local Area Workforce Development Board Remote
CPS 06-2022, Change 2 Attachment 2 – Oversight and Monitoring of the One-Stop Operator

ATTACHEMENT
Attachment A: Monitoring Schedule

CREATION DATE
July 2022

REVISION DATE
December 2024
March 2026