

1200POL Compliance Monitoring (Rev2)

Effective Date: July 2015

Last Updated: May 2025

Purpose

To establish the standards and guidelines for monitoring the Workforce Innovation and Opportunity Act (WIOA) Title I programs to ensure compliance with federal, state, and local regulations, program performance standards, fiscal integrity, and equal opportunity requirements.

Background

The Olympic Workforce Development Council (OWDC) maintains the highest level of integrity of public resources and does so by implementing rigorous compliance monitoring of its grants and contracts to ensure resources are used for authorized purposes and protected from waste, fraud, or abuse. The Workforce Innovation and Opportunity Act (WIOA) Title I and related discretionary awards provide funding to support employment and training activities for adults, dislocated workers, and youth. To ensure accountability and effectiveness, it is critical to monitor programs regularly.

Policy

The OWDC Program Supervisor and Program Analyst are responsible for monitoring all programs and each WIOA Title I and Discretionary Grant subrecipient in accordance with funding requirements. Program monitoring is conducted quarterly, with the exception to Employment Security Department (ESD) Monitoring annual monitoring for the corresponding quarter. Equaling three (3) program monitoring throughout the program year. Fiscal, administrative, and equal opportunity monitoring is conducted annually.

Risk Assessment Process

The risk assessment process identifies areas requiring heightened scrutiny within the WIOA Title I and Discretionary Award programs, ensuring that fiscal monitoring efforts are targeted to the highest-risk areas.

- i. A risk assessment will be conducted by the Program Supervisor prior to awarding funds to service providers and subrecipients to ensure funds will be managed responsibly and that providers and subrecipients have the capacity and systems in place to comply with federal and state requirements.
- ii. Service providers and subrecipients completed risk assessments will guide monitoring and oversight strategies by providing an assessment of risk levels (low, moderate, high). A low-risk designation suggests strong compliance, effective financial management, and minimal need for intensive oversight resulting in standard annual monitoring. While a moderate-risk designation would necessitate more frequent monitoring and oversight. A high-risk designation would suggest significant compliance issues or weaknesses and could warrant serious considerations, including contract termination.

Fiscal Monitoring

- Review financial records to ensure expenditure aligns with approved budgets, cost categories, and allowable costs under 2 CFR 200 and WIOA regulations.
- Review subrecipient single audits and issuance of management decisions on relevant findings.
- Verify timely submission of financial reports and reconciliation of accounts.
- Evaluate internal controls and adherence to procurement policies.

- Review risk assessments to identify areas requiring heightened scrutiny and to guide the focus of fiscal monitoring activities.
- Compliance with the local Steven's Amendment Policy.

Administrative Monitoring

- Review contracts, agreements, and policies for compliance with governing laws.
- Assess staffing capacity and training compliance for administrative personnel.
- Confirm adherence to grievance procedures and incident reporting guidelines.
- Prevention of fraud or abuse.

Equal Opportunity Compliance

- Confirm that local service providers comply with non-discrimination provisions under WIOA Section 188.
- Verify that reasonable accommodation is provided to individuals with disabilities.
- Monitor the accessibility of facilities, programs, and services.
- Assess subrecipients compliance with local policies: Records and Documentation and Protection of Personally Identifiable Information.

Program Monitoring

- Ensure data entry accuracy in local, state, and federal management information systems.
- Participant file comprehensive and data element validation review, as outlined by ESD Monitoring requirements.
- Evaluate performance metrics, service delivery, and participant outcomes against negotiated local performance goals.
- Ensure alignment with state and federal objectives, including serving priority populations.
- Conduct desk reviews and on-site visits to assess compliance with participant eligibility, case management, and service delivery requirements.

Access to Files

- Authorized representatives of the OWDC, state workforce agency, and federal authorities must have full access to all program, fiscal, and administrative records.
- Records must be stored securely and retained in accordance with WIOA record retention policies (minimum of three years or as specified by state and local regulations).
- Electronic records must comply with data security standards outlined in applicable regulations.

Corrective Action Plans are defined as a specific plan of action established to correct a specific program of non-compliance with WIOA law, regulations, or contract.

- Monitoring findings must be documented and communicated to the entity being reviewed.
- Subrecipients or service providers must develop and submit a Corrective Action Plan (CAP) within 30 days of receiving the monitoring report.
- CAPs should address identified deficiencies, propose corrective actions, and include timelines for resolution.

- Follow-up reviews will be conducted to verify implementation of corrective actions.
- Items identified in CAP will be reviewed in subsequent quarterly monitoring to assess whether these items have been corrected.
- Corrective Actions Plans are required for any Performance Metrics that fall below 15% of target enrollments, training, and employment.
- Corrective plans for expenditure by cost category (in-school and out-of-school youth) or overall expenditure rate are only required if there is a variance more than +15% during the second (2nd) and fourth (4th) quarter.

Reporting

- Monitoring results will be provided to monitored entities in the form of a formal report that is distributed to one or more people with decision making authority at the organization being monitored. In the case where ESD is the entity being monitored; the report should be sent to the appropriate Workforce Services Division Regional Director.
- Reports must include an executive summary, the time period of the review, summary of the scope and scale of the review, identify areas of non-compliance, and steps taken to resolve those conclusions, and any promising practices.
- Periodic updates on monitoring activities will be submitted to federal and state entities in compliance with reporting deadlines.

All policies, monitoring reports, and corrective action plans must be made available upon request to federal and state entities.

References

20 CFR Part 683, WIOA Sec. 184, and Uniform Guidance ([2 CFR 200](#)).

Allowable Costs, Classification of Costs and Prior Approval 3100POL

Complaint and Grievance policy (Rev2) 1100POL

Compliance Monitoring of WIOA Title I and Discretionary Awards, [WorkSource System Policy 5414 \(Rev2\)](#)

Data Integrity and Performance Accountability, [WorkSource System Policy 1020 \(Rev2\)](#)

Records and Documentation Retention 1600POL (Rev3)

Stevens Amendment Language Requirements 3110POL (Rev2)

WIOA Title I Service Provider Procurement and Contracting, [WorkSource System Policy 5404 \(Rev1\)](#)

1211PRO One-Stop Site Assessment and Certification

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Local Workforce Development Boards (LWDB) must evaluate one-stop sites and the one-stop delivery system for effectiveness, including customer satisfaction, physical and programmatic accessibility, and continuous improvement. (In instances where the LWDB is the one-stop operator, the State Workforce Development Board (SWDB) must certify those one-stop sites (per *WIN 1016, Rev1*).

I. Certification Frequency

- a. LWDBs must conduct one-stop evaluation and certification not less than once every three years.
- b. LWDBs may direct “for-cause” site evaluation and certification as determined appropriate and warranted.
- c. For any new comprehensive, affiliate, specialized, or connection site, certification must be completed within **60 calendar days of the site being opened**.

II. Certification Teams

- a. One-Stop certification teams will be established by LWDBs and are responsible for conducting independent and objective evaluation of one-stop sites and making certification recommendations to LWDBs.
- b. One-Stop certification teams are comprised of LWDB members, staff, and individuals who represent local partners with specific expertise serving populations with barriers. Certification team members should be free of any conflicts of interest. Certification teams may utilize experts from the state level or outside of the local area to ensure evaluations are objective. They may also utilize local experts who represent targeted populations but have no financial ties to the one-stop site.

III. On-Site Evaluation

- a. For each site to be certified, a locally determined cross-program committee or team with experience working and delivering services in said site will forward their completed assessment application to LWDB, which will be provided to the Certification team members prior to their on-site evaluation.
- b. Certification team members will evaluate one-stop sites and the one-stop delivery system for effectiveness, including customer satisfaction, physical and programmatic accessibility, and continuous improvement based on each site’s completed assessment tool.
 - i. Evaluations of effectiveness must include how well the one-stop center integrates available services for participants and businesses, meets the workforce development needs of participants and the employment needs of local employers, operates in a cost-effective manner, coordinates services

among the one-stop partner programs, and provides access to partner program services.

- ii. Evaluations of physical and programmatic accessibility must include how well the centers and delivery systems take actions to comply with disability-related regulations implementing WIOA sec. 188, set forth by 29 CFR part 38.
- iii. Evaluations of continuous improvement must include how well the one-stop center supports the achievement of the negotiated local levels of performance for the indicators of performance for the local area. Other continuous improvement factors may include a regular process for identifying and responding to technical assistance needs, a regular system of continuing professional staff development, and having systems in place to capture and respond to specific customer feedback.

IV. Certification Team Recommendation

- a. The certification team using results of its site visit and responses from sites Assessment Application, determines in writing, that the site meets all the criteria to become certified or re-certified. This approval is communicated to the LWDB, the one-stop operator, if applicable, and one-stop leadership within **30 days of completing on-site evaluations**. There are three possible determinations: (1) certification, (2) provisional certification with a requirement that one-stop operators or one-stop leadership provide action plans and timelines for meeting certification standards, and (3) non-certification with a requirement a detailed description of the deficiencies, including an explanation as to why the certification team (or the SWDB certification team, in instances where the LWDB is the one-stop operator) believed the deficiencies could not be addressed or resolved provisionally.

V. Olympic Workforce Development Council Approval

- a. LWDB will present the Certification Team site recommendations for certification, provisional certification, or non-certification to the Olympic Workforce Development Council board for final approval.
- b. Certification approval must be notated within council meeting minutes.

VI. Appeals

- a. Should any comprehensive, affiliate, or specialized one-stop sites be determined not certified those sites have a right to appeal those determinations, in writing, to the LWDB. The appeals will follow the processes and procedures outlined in the Olympic Workforce Development Councils Dispute Resolution policy.

REFERENCES

Description of the One-Stop Delivery System Under Title I of the Workforce Innovation and Opportunity Act. Title 20, Chapter V Subpart A, B, F, and G [20 CFR § 678](#).

Guidance on Services provided through the Adult and Dislocated Worker Programs under WIOA and WP. Training and Employment Guidance Letter [\(TEGL\) 19-16](#).

Implementation of the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act. Title 29, Subtitle A, Part 38, [29 CFR Part 38](#).

One-Stop Assessment and Certification, [WorkSource System Policy 1016\(Rev1\)](#).

One-Stop Operations Guidance for the American Job Center Network, Change 1, Training and Employment Guidance Letter [\(TEGL\) 16-16, Change 1](#).

One-Stop System Dispute Resolution and Appeals, [Washington System Policy 1025](#).

OWDC Dispute Resolution Policy 1400POL (Rev1).

WIOA Establishing One-Stop Delivery Systems, Workforce Innovation and Opportunity Act Final Law H.R. 803 (113-128) §121(e) and §188.