

1200POL Compliance Monitoring (Rev1)

Effective Date: July 2015

Last Updated: November 2024

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 exception to Employment Security Department (ESD) Monitoring annual monitoring 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 expenditures align 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 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 accommodations are 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 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 exceed +15% of target enrollments, trainings, and employments.
- 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 in excess of +15% during the second (2nd) and fourth (4th) quarter.

Reporting

- Monitoring results will be summarized in reports to the OWDB and shared with state oversight bodies as required.
- Reports must include identified strengths, deficiencies, and recommendations.
- Periodic updates on monitoring activities will be submitted to federal and state entities in compliance with reporting deadlines.

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 (Rev1) 1100POL
 Data Integrity and Performance Accountability, WorkSource System Policy 1019:
 Equal Opportunity Policies, including Policy 188.
 Monitoring of Workforce Programs, WorkSource System Policy 1010
 OWDC Program Policies
 Records and Documentation Retention 1600POL (Rev3)
 Stevens Amendment Language Requirements 3110POL (Rev1)
 WIOA Title I Service Provider Procurement and Contracting, WorkSource System Policy 5404
 Compliance Monitoring of WIOA Title I and Discretionary Awards, WorkSource System Policy 5414, Rev 2