ADMINISTRATIVE POLICIES/PROCEDURES

Issuance No: A-23
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Subject: Sub-State Monitoring Policy

Responsible Representative: The Workforce Development Board of North Missouri (WDB) Compliance Coordinator and Fiscal Manager are responsible for monitoring activities. The WDB does not operate programs, all programs are operated by sub-recipients, and therefore the selected monitors are independent of the duties or systems being monitored.

Accountability: WDB staff prepares and submits annual monitoring reports to the Board, Chief Local Elected Officials (CLEOs), and Office of Workforce Development (OWD).

- **Risk Assessment** - Prior to issuing any award under WIOA title I, the WDB will conduct a risk assessment to assess the Sub-recipient's overall ability to administer Federal funds as required under 2 CFR 200.205. As part of the assessment, the WDB will consider any information that has come to its attention and will consider the organization's history with regard to the management of other grants. The tool created by the WDB will take into account the organization's financial stability, quality of management systems and standards, history of performance, timeliness of compliance, conformance to terms and conditions of previous awards, reports, and findings from audits, and ability to implement effectively statutory, regulatory, or other requirements. This Risk assessment will be completed annually following the completion of all other monitoring and will be part of the contract award or renewal process.
- **One-Stop Operator** - The WDB will conduct an annual review of their one-stop operator to ensure compliance with the requirements outlined in 20 CFR 678.620, as well as the responsibilities outlined in the current MOU and One-Stop Operator Contract. The monitoring tool used by the WDB will ensure the One-Stop Operator complies with the requirements of WIOA, the activities per the SOW, performance reporting requirements, and the terms and conditions of the contract or agreement governing the one-stop operator. If it is determined that the one-stop operator is not meeting expectations, corrective action must be taken, which may include contract termination.
- **Program Monitoring** – The WDB will conduct quarterly monitoring of each sub-recipient.
    - This monitoring will include reviewing sample participant files of each funding stream each sub-recipient receives. This review will include, but is not limited to:
        - Documentation of participant eligibility and/or priority for the programs and services received;
        - Orientation to services;
        - Signed acknowledgment from the participant that notification of complaint and grievance rights and procedures was received;

- Justification for the provision of Individualized Career Services or Training services;
- Method of assessment;
- Employment planning;
- Individual Training Accounts including all applicable paperwork/documentation;
- Work-Based Learning including all applicable paperwork/documentation;
- Appropriateness and accuracy of participant payments (i.e., Supportive Services);
- Appropriate data entry;
- Posting of outcomes, including the attainment of a degree or certificate, measurable skill gains, and any supplemental employment data;
- Examination of historical change requests;
- Compliance issues cited in prior federal, state, and local reviews;
- Determination if prior corrective measures have proven effective.
- Compliance with the requirements outlined in the region's Methods of Understanding, Requests for Proposals, and Contract Agreements

In addition to the items above, WIOA Youth program monitoring will take into account:

- Out-of-School Youth 75% expenditure requirement
- 20% work-based learning with an educational component requirement
- 5% limit on In-School Youth enrolled with "Requires additional assistance" barrier, and
- 5% over-income exception

- The Board will also monitor any special initiatives and grants for which the Board has a contract. The monitoring of special initiatives/grants will be based on the scope of work for the specific initiative/grant.
- To determine the files to be monitored, the board will use the following criteria:
  - The Board will monitor a minimum of 20% of the combined total of active participants in the Adult and Dislocated Worker Programs from the previous quarter for each sub-recipient.
  - The Board will monitor a minimum of 20% of the active participants in the Youth Program from each sub-recipient.
  - The Sampling of all programs will be randomly selected, but if activities are not represented in the random sample, files may be replaced to ensure an accurate sampling of activities
  - The Board may monitor more than the minimum, if necessary, based on the results of the risk assessment, prior monitoring, or other identified issues.

        - Samples should include records enrolled in the current program year but may include samples from the previous quarter if needed to meet the sample size.

- **Data Element Validation** – The WDB will conduct Data Element Validation (DEV) quarterly. The purpose of this monitoring will be to ensure performance data elements reported are valid, accurate, reliable, and comparable across programs.
    - The Board will use the statewide electronic case management system DEV report to ensure the proper sample is reviewed.
    - If data issues are found, the monitor will work in real-time to ensure the issue is corrected in a timely manner.
- **Financial Monitoring** – The WDB Fiscal Manager will conduct financial monitoring at least annually to ensure fiscal integrity.
    - At a minimum, one fiscal monitoring will be conducted on-site of in-state providers.
    - The financial monitoring will ensure the adequacy of internal controls and the reliability of the sub-recipient financial management system as they relate to the administrative sub-award and the fiscal goal requirements, and that amounts reported are accurate, allowable, supported by documentation, and properly allocated.
    - The financial monitoring review will include, but is not limited to:
        - Audit Resolution/Management Decision;
        - Financial Reports;
        - Internal Control;
        - Source Documentation;
        - Cost Allocation/Indirect Costs
        - Cash Management;
        - Procurement; and
        - Compliance with WDB Policies and Procedures/Scopes of Work including stand-alone special initiatives/grants administered by the Board.
- **Equal Opportunity Monitoring** – The WDB Compliance Coordinator is responsible for coordinating each recipient's obligations under 29 CFR Part 38, Section 188 of WIOA and the State of Missouri's Nondiscrimination Plan. The Equal Opportunity Officer will conduct quarterly monitoring that includes, but is not limited to:
    - Ensuring compliance with the nondiscrimination and equal opportunity provisions of WIOA, 29 CFR Part 38, and the Missouri Nondiscrimination Plan, and negotiating, where appropriate, with a recipient to secure voluntary compliance when noncompliance is found under §38.91(b).
    - The Local Equal Opportunity Officer is responsible for monitoring small service providers (ETPS, OJTs, Work Experience Employers only) defined under 29 CFR 38.4(hhh) which includes monitoring the small service provider for adopting and publishing complaint procedures, and

processing complaints, in accordance with Section 188 of WIOA, 29 CFR Part 38 and the Missouri Nondiscrimination Plan.

- Quarterly monitoring for the compliance of recipients with WIOA section 188, 29 CFR Part 38, and the Missouri Nondiscrimination Plan, including a
- A determination as to whether each recipient is conducting its WIOA Title I-financially assisted program or activity in a non-discriminatory way. At a minimum, each annual monitoring review required must include:
    - A statistical or other quantifiable analysis of records and data kept by the recipient under §38.41, including analyses by race/ethnicity,
    - sex, limited English proficiency, preferred language, age, and disability status;
    - An investigation of any significant differences identified in paragraph (b)(1) of this section in participation in the programs, activities, or employment provided by the recipient, to determine whether these differences appear to be caused by discrimination. This investigation must be conducted through a review of the recipient's records and any other appropriate means; and
    - An assessment to determine whether the recipient has fulfilled its administrative obligations (for example, recordkeeping, notice, and communication) and any duties assigned to it under the Missouri Nondiscrimination Plan.

- **Monitoring Reports** – WDB Staff will prepare and present annual monitoring reports to the Board to cover each monitoring required above. These reports will include the cumulative findings of the quarterly monitoring conducted during the program year. The report will be presented to the Board during the regularly scheduled Board Meeting in June of each year. The annual report will also be provided to each sub-recipient no later than June 30th of the program year the report was created.
    - The content of the reports shall include but is not limited to:
        - The adequacy of assessment,
        - Planning of activities and services,
        - Coordination with One-Stop Delivery System partners to meet the comprehensive needs of customers and customer outcomes.
        - Areas of non-compliance
        - Corrective actions proposed to resolve the issue that could include training and technical assistance.

    The Board will review subrecipients corrective action responses and issue a determination of acceptance or alternative corrective action as well as technical assistance when appropriate.

- **Additional Responsibilities –** To ensure the Board and staff are conducting business openly and transparently, the Board is required to make available to the public, regularly through electronic means (website www.wdbnorthmo.org) and open meetings the following information:
        - Local Plan and Modifications

- Board Members and their affiliations
- Selection of One-Stop Operators
- Award of Grants or Contracts to Eligible Training Providers of WIOA activities including Youth Programs and Activities,
- Minutes of formal meetings of the Local WDB, and
- Board By-Laws, consistent with 20 CFR 679.310 (g)

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