

Southwest Iowa Workforce Development Board

Monitoring Policy

Approved Date: January 24, 2022

Effective Date: January 24, 2022

Background: The Southwest Iowa Workforce Development Board (SWIWDB) on behalf of the Chief Lead Elected Official (CLEO) for the Southwest Iowa Workforce Area (SWWA), must conduct monitoring of all Title I-related contracts at least annually or, for contracts lasting less than one year, once during each contract term for financial and programmatic compliance.

SWIWDB must also ensure that the use, management, and investment of funds for workforce development activities are consistent with 2 CFR 200 and maximize performance outcomes under section 116 of the Workforce Innovation and Opportunity Act (WIOA).

SWWDB Primary Responsibilities

Per IWD Chapter: 9 Section: 2.1 the SWWDB must conduct oversight, which may include, but is not limited to:

- Administration and Governance
- Workforce Development Program Delivery
- Fiscal Management
- Performance and Reporting Management
- Additional review areas, as applicable

Monitoring Schedule

All Title I-related contracts shall be monitored by the staff of the SWWDB and/or fiscal agent for each program they operate, at least annually for all WIOA related and certain non-WIOA related operations in the SWIWA. When an onsite review will take place, the sub-recipient shall be notified of the intended dates of scheduled monitoring at least thirty (30) days prior to the date of the visit whenever possible. The SWIWDB reserves the right to conduct unscheduled monitoring in conjunction with or in response to investigations of misfeasance and/or malfeasance or previous monitoring findings.

Programmatic, fiscal, and operational monitoring will be conducted to measure compliance with WIOA regulations, Iowa Workforce Development (IWD) and local policies. Monitoring will include a comprehensive examination of compliance issues cited in prior state and local reviews and the determination where corrective measures were taken to address and resolve those issues.

Responsible Representatives

- The board executive director will perform the programmatic monitoring of the sub-recipients, or designee, along with oversight of the fiscal agent.
- The fiscal agent staff will be responsible for the oversight and monitoring of the sub-recipients fiscal operations.

Oversight Methods

SWIWDB may utilize any of the following methods of monitoring oversight

- Random sampling
- Risk assessment
- Desk review
- On-site visit
- Questionnaires and interviews of customers, employers, One-Stop Operators
- Customer satisfaction survey
- Other necessary methods, as applicable

SWIWDB is not restricted to using only the aforementioned methods, and may incorporate other methods as deemed necessary.

Oversight Tools

SWIWDB will develop written oversight tools that assist the Local Area in conducting a thorough review of programs and activities. The varying requirements of each funding stream involved will be taken into consideration when designing the tools and determining the most effective activities to be used. The tool used for each oversight activity will be included with the final monitoring report. Examples of oversight tools may include, but are not limited to:

- Risk Assessment Tool
- Monitoring Review Guide
- Corrective Action Tracker
- Corrective Action Plan Template
- Monitoring Report Template

Programmatic Monitoring Requirements

In accordance with IWD policy Chapter: 9 Section: 2.2.2 program monitoring may include on-site reviews of policies, plans, and procedures governing all segments of the contracts program activities and operations at least once during the program year. Additionally, monitoring may include reviewing services to participants for program accountability and to ensure sub-recipients perform in accordance with the terms, conditions, scope of work, and specifications of their contracts. Participant files may also be reviewed as part of program monitoring to include but is not limited to:

- Participants eligibility and/or priority for the specific program and services;
- Orientation to services;
- Signed acknowledgement from the participant that notification of complaint and grievance rights and procedures were received;
- Justification for the provision of Individualized Career Services or Training services;
- Method of assessment;

- Employment planning;
- Individual Training Accounts;
- Appropriateness and accuracy of participant payments (i.e., supportive services);
- Appropriate data entry and posting of outcomes, including attainment of a degree or certificate and any supplemental employment data; and
- Any other applicable Data Elements.

A random sampling of files from every funding stream will be selected to test eligibility and compliance in every funding stream for which there is a contract with SWIWDB. Programs funded by other Grantors will follow the monitoring requirements in the respective scope of work.

The monitoring staff may also review one or more personnel records of individuals paid through contracts with the SWIWDB. The purpose of this review would be to ascertain if subcontractor staff:

- Possess the education and experience to perform the responsibilities of the position;
- Expend the time on contract related activities charged against the contracts being monitored;
- Have signed complaint and grievance procedures on file.

EEO and ADA Compliance

Monitoring staff may survey the subcontractor's hiring practices, promotion practices, facilities, and outreach and intake procedures to ascertain the sub-recipient's compliance with the Equal Employment Opportunities and the Americans with Disabilities Act.

Fiscal Monitoring

At least once during each program year, the SWIWDB fiscal agent staff will conduct an on-site financial monitoring review of each sub-recipients financial procedures and systems. Monitoring will be conducted to comply with WIOA Section 184 (a) (4) [29 U.S.C. 3244(a) (4)], annual SWIWDB agreements, and 2 CFR Part 200 and Part 2900. The financial review will ensure adequacy of internal controls and the reliability of the sub- recipient's financial management systems as they relate to the administrative sub-award. This monitoring review will ensure that the sub-recipient meets the terms and conditions of the sub-award and the fiscal goal or requirement, and that amounts reported are accurate, allowable and supported by documentation and properly allocated. The monitoring review will result in a written report to the SWIWDB identifying areas of noncompliance and recommendations. The monitoring shall be completed using a standardized monitoring instrument, which may be customized to meet special contract provisions. The review may include, but will not be limited to, reviewing the following processes and documentation, and will be adjusted as needed:

- Financial reporting,
- Internal controls,
- Source documentation,
- Cost allocation/indirect costs,

- Cash management,
- Procurement and inventory review.
- A regular examination of expenditures to test transactions against cost categories, cost limitations,
- Audit resolution/management decision
- An examination to determine if program income exists, is being accounted for and reported in accordance with applicable requirements;
- A review and interview to ensure that staff is following the proper guide for determining costs applicable to WIOA (OMB Circular) and WIOA procurement guidelines;

NOTE: Depending upon the finding or concern and the Risk Assessment, SWIWDB may elect to monitor all or specific areas on a more frequent basis. Subsequent monitoring will review prior financial monitor reports and investigate any prior findings and their resolution.

Monitoring Process

1. The monitor will determine the timeframe for monitoring and sample size and method to be used and will be sent to the sub-recipient in a notification letter.
2. Entrance and exit conferences will be scheduled for onsite monitoring with the sub-recipient's leadership staff;
3. The sub-recipient will receive the list of documents to be monitored from the monitor and the monitoring tool.
4. A time frame for submission of documentation by the sub-recipient will be set by the monitor based on the type of monitoring method and noted in the notification letter.
5. The monitor will record any comments, concerns, or recommendations on the monitoring tool. The monitor will also add comments regarding Best Practices found during the review.
6. The monitor will review everything with the sub-recipient and submit the report to the sub-recipient along with any findings and/or recommendations. If there are any findings, the sub-recipient will be required to submit a corrective action plan within 15 business days after the sub-recipient receives the written monitoring report. Corrective Actions must be satisfactorily implemented within 3 months of the finding. If that is not possible, the sub-recipient must submit a request for extension, along with justification, to the SWIWDB executive director.
7. When the response is received from the sub-recipient, the monitor will produce a written monitoring report for each sub-recipient and submit to the executive director for review. The report will outline, at a minimum:
 - a. type of monitoring and oversight tools used
 - b. the activities which were monitored;
 - c. the systems which were monitored;
 - d. monitoring findings; and
 - e. if applicable individual participant files which were found to contain errors;
 - f. recommended corrective action, including training and technical assistance

- g. subcontractor performance
 - h. contract concerns
 - i. best practices
 - j. recommendations
8. The executive director will compile the annual reports of the sub-recipient, which will include performance measures, expenditure and contract performance and the fiscal monitoring reports.
 9. The Operations Committee will review program monitoring reports and the Finance Committee will review all financial monitoring reports and make recommendations to the Executive Committee if necessary. The Committees will review the monitoring report, the sub-recipient's response and may recommend to the SWIWDB and CEOs:
 - a. Accept the subcontractor's response
 - b. Reject all or part of the response and/or require resubmission of the response
 - c. Require additional corrective action, or
 - d. Recommend the institution of sanctions against the subcontractor to the SWIWDB. If the Executive Committee recommends sanctions, the SWIWDB shall take up the recommendation at the next scheduled SWIWDB meeting or the WDB Chairperson may call a special meeting of the SWIWDB to consider the recommendation.
 10. The SWIWDB and CLEO, may accept or reject the summary monitoring report, or may request additional information regarding all or part of the report. When the SWIWDB and CLEO is satisfied that the process has been satisfactorily completed, they will either accept the original, amended or substitute summary report, and move for suspension of monitoring.

NOTE: As this report will be considered a public document, names of participants will not appear in the final report presented to the Board and Committees of the Board.

SWIWDB Responsibilities in Consultation with Iowa Workforce Development (IWD)

SWIWDB will submit the annual approved monitoring report and resolutions to IWD for review at the time of issuance. SWIWDB will electronically submit new or updated documents, and monitoring reports and resolutions to: iwd.WIOA@iwd.iowa.gov

Process for Addressing Disagreements

Should the sub-recipient disagree with any findings from the monitors they have the right to submit a formal request in writing for a review to the executive director, along with justification and documentation in support of their request. The executive director will provide a written response within 10 business days of the date the request was submitted. If a satisfactory decision cannot be agreed upon the sub-recipient has the right to file a grievance with the Executive Committee. The Executive Committee will perform a review of all party's documentation and ask any clarifying questions, and provide the SWIWDB's final decision on the issue within 20 business days of the sub-recipient's formal request.