

Central Workforce Development Board Sub-State Monitoring Policy

The region will conduct substate monitoring in accordance with DWD Issuance 16-2015, *Statewide Sub-State Monitoring Policy*. Subrecipients and programs will be monitored a minimum of once per year. Program monitoring may be conducted more often as needed to assure compliance with all rules and regulations.

Responsible Representative: The region's compliance coordinator will perform program monitoring. This staff position is independent of program operations and reports directly to the executive director. Financial Monitoring will be conducted by the fiscal officer, and may involve other fiscal staff. Staff conducting the monitoring are employed directly by the Board and have complete independence from the subrecipients and report directly to the CWDB executive director.

Accountability: An annual fiscal and program monitoring report will be submitted each Program Year to the Board and the Chief Elected Official.

Compliance and Performance: Annual reports to the Board and Chief Elected Official will include information on compliance with the terms and conditions of each scope of work. Monitors will also provide subcontractor and regional performance reviews to the Board and Chief Elected Official on an annual basis. Monitoring reports will also address the adequacy of assessment, planning of activities and services, and coordination with One-Stop System partners to meet the needs of customers. When problems are identified, prompt and appropriate action will be taken to correct the situation.

Compatibility: Programmatic and operational oversight will assess compliance with WIOA regulations and DWD policies.

Quality Assurance: The quality of regional programs is of paramount importance. Programs will be monitored to ensure they are of high quality and that the delivery process is effective. Continuous improvement will be the standard; compliance issues cited in prior federal, State, and local reviews will be monitored. Written determinations will state whether corrective measures taken to address prior issues have been effective.

Methodology and Target Universe: Random sampling techniques will be used in participant files reviews to test eligibility in every funding stream for which there is a contract with DWD.

When reviewing WIOA Adult and Dislocated Worker participant records, the two funding streams will be combined then sampled by service. Each Program Year, the region will monitor a separate statistically valid sample of Adult and Dislocated Worker participants enrolled in each of the following services:

- WIOA Career-level-only enrollments (Membership)
- Classroom Training
- On-the-Job Training
- Work Experience/Internship
- Supportive Services/Needs-related payments
- Any other services that result in a direct payment being made to, or on behalf of, a participant.

The following sample sizes will be completed for each universe reviewed.

<u>Universe</u>	<u>Sample Size</u>
1-200	69
201-300	78
301-400	84
401-500	87
501-1,000	96
1,001-2,000	100
2,001-10,000	105

Participant records will be reviewed for:

1. Participant eligibility and priority for program and services received.
2. Orientation to services.
3. Complaint and grievance rights and responsibilities.
4. Justification for Individualized Career Services or Training services.
5. Method of assessment
6. Employment planning
7. Individual Training Accounts.
8. Appropriateness and accuracy of participant payments.
9. Appropriate data entry.
10. Posting of outcomes, including attainment of a degree or certificate and any supplemental data.

Youth Monitoring: Monitoring will be conducted by the region’s compliance coordinator. The compliance coordinator reports directly to the executive director and works independently of the Youth program, as demonstrated by the CWDB organizational chart. There are no conflicts of interest or overlapping duties between the compliance coordinator and the Youth program. This organizational separation will ensure complete performance accountability

The identical process will be followed for the monitoring of all programs. Transparency, integrity, and accountability will guide the process at every level.

Monitoring will include the following items that are new with WIOA.

Out-of School Youth 75% expenditure requirement

20% work-based learning with educational component requirement

5% limit on In-School Youth enrolled with “Requires additional assistance” barrier

5% over-income exception, and

New eligibility criteria barriers

Financial Monitoring Review (FMR): The Board will conduct an annual on-site Financial Monitoring Review of subrecipients to ensure fiscal integrity, in compliance with WIOA section 184(a)(4) [29 U.S.C. 3244(a)(4)], annual DWD agreements, and 2 CFR Part 200 and Part 2900. The review will assess the adequacy of internal controls and the reliability of the subrecipient's financial management system. The meeting of the subrecipient's terms and conditions of the subaward and the fiscal goal or requirements will be monitored. Monitoring will ensure that amounts reported are accurate, allowable, supported by documentation, and properly allocated. A written report will be given to the Board identifying areas of noncompliance and recommendations to remedy the situation.

The Financial Monitoring Review will include, but not be limited to, reviews of the following:

1. Audit Resolution/Management Decision
2. Financial Reports
3. Internal Controls
4. Source Documentation
5. Cost Allocation
6. Cash Management
7. Procurement
8. Inventory

Additional financial and programmatic monitoring will be completed to review special initiatives and stand-alone summer youth programs are administered in accordance with the project's scope of work.