

EASTERN WASHINGTON PARTNERSHIP

WORKFORCE DEVELOPMENT COUNCIL

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SUBJECT MONITORING

PURPOSE

Monitoring is the cooperative process by which the Workforce Development Council (WDC), in partnership with the service providers, assesses quality, determines compliance, and identifies technical assistance needs.

Monitoring is performed in a timely manner to ensure necessary corrective action and includes, but is not limited to, a review of the data, observation of operations, examination of records, and interviews of program staff.

DEFINITIONS

Compliance Finding—a violation of the Workforce Innovation and Opportunity Act (WIOA), federal/state regulations or policies. These violations create a significant risk to the program, the services or its resources.

Administrative Issues—a situation or circumstance that presents a risk to the program, the services or its resources, but not a violation of the Act, or a specific federal/state regulation or policy.

Differences—a suggestion or "Recommendation" by the monitor as to methodology in a given situation, but not a violation of the Act, federal/state regulations or policies and not a situation or circumstance that presents a risk to the program, the services or its resources.

POLICY

I. Role of the WDC

The WDC shall annually conduct on-site monitoring of each service provider within the workforce development area to ensure compliance with all program requirements; and monitor service providers to ensure compliance with the procurement standards and take appropriate action to secure compliance.

In order to conduct oversight and monitoring activity, the WDC shall perform an independent test of the fiscal, internal controls, and compliance systems.

Upon the discovery of issues of risk, the WDC monitors will:

- determine if it is a compliance finding;
- inform service provider of technical concerns;

Monitoring reports from the WDC will include Compliance Findings, Administrative Issues, and Recommendations.

II. WDC Monitoring Components

Monitoring of service providers will determine whether or not:

- expenditures against cost categories and cost limitations are monitored regularly;
- there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations including state provisions and WDC policies; and technical assistance is necessary.

If it is determined that a service provider is not in compliance in an area, corrective action will be required.

The monitoring report will include the assurance that if any service provider has not fulfilled the corrective action plan for any deficiencies in audits and performance and is not in compliance, that a suspension or termination of that service provider's contract could occur.

III. Annual Review

The WDC shall conduct an annual review of all contracts entered into with service providers. The reviews will be in accordance with established program requirements and the terms of the contracts or agreements.

IV. Schedules

In order to assure that adequate monitoring is occurring in a timely manner, and to ensure necessary corrective action, a regular monitoring schedule will be followed. Monitoring schedules, checklists, and reports will be available for review.

V. Monitoring Requirements

The WDC will review program administration and program systems to ensure that efficient and effective internal controls are in place to assure compliance with WIOA, state provisions, federal, state, and local laws, and job training plans. The following areas will be included in the review:

1. Audit Resolution
2. Complaints/Grievance Systems

3. Participant Eligibility
4. Financial Management
5. Performance Assessment
6. Personnel/Equal Opportunity
7. Non-Discrimination/Affirmative Action
8. Procurement/Contracts
9. Property
10. Adults and Dislocated Workers
11. Youth
12. Management Information Systems
13. Prevention of Fraud and Abuse
14. File Review
15. Follow-up on Prior Findings/Corrective Actions

VI. Corrective Action

As part of the WDC's annual on-site monitoring of the service providers, the WDC may determine that a service provider:

- is not in compliance with the requirements established in the Act, in Department of Labor (DOL) regulations or in state provisions;
- has circumstances that present a risk to the program, services or resources.

If such findings arise during the course of the monitoring, the service provider will be notified and will be given a period of time (not more than 60 days) to comment and take appropriate action. The WDC shall require the corrective action to secure prompt compliance or eliminate risk. As part of this policy the WDC may conduct on-site follow-up reviews of issues within at least 180 days of the review or prior to the close of the agreement. Technical assistance may be provided to support any corrective action if needed or requested.

VII. Limitations

Monitoring and oversight activities conducted by the WDC may not identify all problems with the service provider.

Service providers are to maintain internal monitoring efforts on a continuing basis. Service providers should ensure that on-going monitoring activities do not replace or supersede the requirements for audits, validation reviews and other oversight activities.