

**Benton-Franklin Workforce Development Council**

**Policy No. 55-024**

**Date: 10/25/05**

**SUBJECT: Monitoring Policy**

**ORGANIZER: WIA Title IB**

**Background**

The Workforce Investment Act Final Rules require a statewide monitoring system and require regular oversight and monitoring by each recipient and subrecipient of WIA activities and those of its subrecipients and contractors. Regulations [Ref. 20 CFR 667.400 (c)(1)] also require each recipient and subrecipient to continuously monitor grant-supported activities in accordance with uniform administrative requirements.

**Policy**

Benton-Franklin Workforce Development Council (BF-WDC) is responsible for continuously monitoring its subrecipients of funds under the Workforce Investment Act (WIA). The BF-WDC fulfills this statutory responsibility described in Section 188 of WIA as outlined below:

- (1) The BF-WDC has established and adheres to appropriate systems for award and monitoring of agreements with subrecipients. The system contains acceptable standards for accountability;
- (2) The BF-WDC enters into written agreements with subrecipients that establish clear goals and obligations in unambiguous terms;
- (3) The BF-WDC acts with due diligence to monitor the implementation of these agreements including the carrying out of the monitoring activities at reasonable intervals; and,
- (4) The BF-WDC takes prompt and appropriate corrective action upon becoming aware of any evidence of violation of WIA, associated regulations, state provisions, BF-WDC policy, and subrecipient agreements.

**Procedures & Process**

The specific monitoring and related procedures conducted by the BF-WDC to fulfill its responsibilities include the following:

- (1) Submission of an annual Monitoring Plan as required under State Policy [Ref. No. 3425], and on-site monitoring of the contractor in conformance with the annual Monitoring Plan to be conducted through the Continuous Quality Improvement (CQI) review process, and the annual onsite monitoring review with follow up as indicated in resultant CQI and monitoring reports;

(2) A thorough review of invoices and supporting documents submitted by the contractor to assure that expenditures have been made appropriately against cost categories and within cost limitations;

(3) A thorough on-site review of financial records and the source documents, i.e., invoices, receipts, vouchers, cancelled checks, time sheets, etc.;

(4) A thorough on-site review of programmatic records, i.e., participant files including paper and computer case management files, eligibility, supportive services documentation;

(5) On-site review of compliance with WIA, federal regulations (including OMB Circulars A-87 and A-122), state and local policies, and the local strategic plan;

(3) A thorough review of invoices submitted by the contractors to monitor planned versus actual expenditures;

(5) A thorough review of management information system documents submitted and entered into the management information system to monitor planned versus actual performance and equity in service delivery;

(6) Review with the contractors of any exceptions, issues, or lack of internal controls found during reviews;

(5) Provision of ongoing training and technical assistance to the contractors;

(6) Provision of ongoing consultation to contractors on the topics of fiscal invoicing and documentation, MIS procedures, documentation of eligibility and service delivery, management, and program service delivery design;

(7) Review with the contractors of any exceptions, issues, or lack of internal controls.

#### **A. Areas of Program Management and Operation to be Monitored**

The BF-WDC will perform on-site monitoring of program management and operation in the following areas:

- Adult Program Review
- Dislocated Worker Program Review
- Youth Programs Review
- Grievance Procedures
- Internal Contracts
- Individual Training Accounts
- Management Information Systems
- Personnel, EEO, and Nondiscrimination
- Property Management

This review will be conducted by BF-WDC staff with expertise in each of these compliance areas.

### **B. Monitoring Process**

BF-WDC monitoring process is an ongoing, proactive, technical assistance focused format referred to as Continuous Quality Improvement or CQI. The BF-WDC issues quarterly monitoring reviews to contractors for their information and correction of any issues identified during the informal review of participant files, MIS data, and monthly contractor invoicing.

Formal reports are compiled from CQI information gathered throughout the year and the annual on-site fiscal monitoring of each contractor. Any findings or questioned costs are addressed in the finding and determination resolution process. The BF-WDC reviews with the contractors any exceptions, issues, or lack of internal controls found, and mutually agree on written plans for corrective action (if appropriate).

The process consists of the following steps:

- Entrance Interview
- Program and Fiscal Data Gathered
- Preliminary Report Drafted
- BF-WDC Management Review
- Exit Interview Scheduled
- Preliminary Report Sent to the Contractor for Comment
- 30-day Contractor Response Time
- BF-WDC Review and Determination on Contractor Response
- Contractor Agreement or Non-Agreement with Findings
- Final Report Issued and Distributed

(See Detailed Program Monitoring Process)

(See Detailed Fiscal Monitoring Policy and Procedures)

Reference:

- 20 CFR 667.400 (c)(1)
- State Policy No. 3425