

## **Monitoring & Oversight Policy**

The NWPA Job Connect has a responsibility to provide oversight and monitoring of programs and activities supported with funds that flow through the fiscal agent. This policy is intended to ensure compliance with the Workforce Innovation and Opportunity Act (WIOA) and all state and local requirements while at the same time, providing guidance for continuous improvement and technical assistance.

The NWPA Job Connect is committed to ensuring compliance with Sections 183, 184 and 185 of the Workforce Innovation and Opportunity Act; 20 CFR Part 683; 29 CFR Parts 95 and 97, Uniform Administrative Requirements; 2 CFR Part 200; appropriate OMB Circulars and requirements. Oversight includes review of administrative and fiscal requirements, as well as program performance to ensure that the programs achieve intended results, and that grant funds and other assets are adequately safeguarded.

### **RESPONSIBILITY**

The oversight responsibilities of the NWPA Job Connect include, but are not limited to, the following:

#### **Administrative Oversight**

- Local governance
- Local plans and agreements
- Local board compliance and certification
- PA CareerLink<sup>®</sup> certification
- Organizational structure
- Administrative policies and procedures
- Subrecipient capacity to provide oversight
- Americans with Disabilities Act (ADA) compliance
- Non-discrimination and civil rights provisions
- Equal opportunity requirements
- PA Sunshine Act compliance
- Right-to-Know Law compliance

#### **Programmatic Oversight**

- Program management and standards
- Program policies and procedures
- Service delivery
- Access to services
- Participant eligibility
- Performance measures and program outcomes

- Services to priority and special populations
- Record retention and case file maintenance
- Subrecipient monitoring activities
- Supportive services and needs-related payments
- Youth activities
- Data analysis
- Data element validation

### **Fiscal Oversight and Reporting**

- Fiscal agent responsibilities and activities
- Fiscal policies and procedures
- Fiscal plans and agreements
- Subrecipient monitoring activities
- Cost allocation and allowability
- Resource sharing
- Cash management practices
- Procurement practices
- Internal controls
- Reporting requirements
- Closeout procedures
- Audits
- Subcontract compliance
- Program income and reporting
- Property management
- Record retention
- Generally Accepted Accounting Principles (GAAP) adherence
- Payroll administration

### **Other**

At the discretion of NWPA Job Connect, specialized oversight activities may be conducted to investigate allegations of mismanagement, to clarify unusual findings, or for any other reason.

## **METHODS OF OVERSIGHT**

The following activities may be utilized in the local oversight process:

### **On-Site Visit**

NWPA Job Connect will perform fiscal and programmatic monitoring to ensure all funds allocated to the local workforce development area are adequately safeguarded, program performance levels are met, and local subcontractors are programmatically, operationally, and fiscally compliant.

### **Desk Review**

NWPA Job Connect may perform desk reviews of programs and related financial and participant data to test compliance to identify potential or recurring problems to prepare for more in-depth on-site visits, and to conduct more systematic and continuous oversight.

### Random Sampling

NWPA Job Connect may select a pre-defined volume of samples at random to be used to help identify compliance violations, questioned costs, and/or potential weaknesses in performance.

Note: All participant data and any other data that contains Personally Identifiable Information (PII) must be handled per the NWPA Job Connect Personally Identifiable Information Policy # 306.

### Surveys

NWPA Job Connect may use surveys to help identify compliance violations, questioned costs, or potential weaknesses in performance, as well as to capture promising practices or need for technical assistance.

## **OVERSIGHT RESOURCES**

NWPA Job Connect will use the following resources to meet their responsibility for oversight and monitoring of program and activities:

### Monitoring Tools

NWPA Job Connect has developed written oversight tools to assist in conducting thorough review of programs and activities, taking into consideration the varying requirements of each of the funding streams. The monitoring tool includes at a minimum:

- Name of the agency
- Name of the individual performing the monitoring
- Date of the monitoring
- Services or activities provided
- Total amount of the contract and sources of the funding
- Date(s) of the oversight activity
- Staff interviewed
- Summary of the results that include program strengths, concerns, deficiencies, and areas where technical assistance may be needed

### Technical Assistance

NWPA Job Connect will provide technical assistance, as needed, as a means of improving program operations, facilitating the implementation of corrective action, or providing information. Assistance may include but is not limited to: special training, discussion of areas of concern, evaluation of program operation, or any combination thereof.

## **OVERSIGHT PROCESS**

### Activities

NWPA Job Connect oversight activities will include monitoring and will assess the subrecipient and contracted service provider's compliance with federal, state, and local laws, regulations, contract provisions/grant agreements, policies, and official directives

and compliance with the appropriate uniform administrative requirements for grants and agreements. Oversight activities will encompass both uniform administrative requirements and programmatic monitoring.

#### Local Oversight Plan

NWPA Job Connect has developed and implemented a separate local oversight plan that includes the oversight process, risk assessment process, projecting risk, oversight frequency, and oversight schedule and timeline for the oversight activities as outlined in this policy.

### **REPORTING AND RESOLUTION REQUIREMENTS**

The LWDA monitor will submit a written oversight report within thirty (30) days of a monitoring visit to the NWPA Job Connect and the monitored entity. The oversight report will identify any instances of non-compliance and provide recommendations for corrective action(s) and program quality enhancements. A Corrective Action Plan to rectify any findings must be submitted to the LWDA monitor by the monitored entity within thirty (30) days of the issuance of the report or as requested in writing by the NWPA Job Connect. Follow-up activities will be conducted within 90 days of the date of the corrective action plan approval. A copy of the completed monitoring tool used to conduct the oversight activity will be made available to the monitored entity upon request.

The LWDA monitor will prepare a summary of monitoring findings following any monitoring conducted that is presented for review through NWPA Job Connect committees. The respective NWPA Job Connect committee(s) will review and provide recommendations to the full board for approval. Local monitoring results following any monitoring conducted will assist the NWPA Job Connect with strategic planning efforts, as this may identify an area needing increased NWPA Job Connect focus. These reports can enable the NWPA Job Connect to assess PA CareerLink<sup>®</sup> and program contractor compliance, plan future technical assistance activities, and adjust policies to reflect emerging economic opportunities. In addition, local monitoring reports will be made available for state and/or federal review.

### **CONTROLS**

NWPA Job Connect will:

- Require reports from the contract service providers outlining monitoring reviews, noncompliance issues, and the status of corrective actions
- Ensure that a briefing regarding oversight activities and findings is provided to the NWPA Job Connect at regularly scheduled meetings and that the briefing is documented
- Perform an annual evaluation of the oversight function to determine its effectiveness

### **APPEALS**

NWPA Job Connect’s Local Monitoring Appeal Policy #312 provides an appeal opportunity for the monitored entity to address any requests, reviews, timelines, adverse and favorable determinations, and resolutions, consistent with the process outlined in the state’s Financial Management Policy and its attached Financial Management Guide.

**REFERENCES**

WIOA Section 183  
20 CFR Part 683.410

**HISTORY**

Name	Date	Rev Level	Description of change	Effective Date
Deb O’Neil	08/07/2014	A	Policy approved by new LWIB	
Deb O’Neil	09/05/2014	B	Policy changes per state recommendation	
Deb O’Neil	01/13/2015	C	Policy changes per USDOL performance audit recommendations	02/25/2015
Deb O’Neil	03/15/2017	D	Update for WIOA	06/09/2017
Deb O’Neil	10/31/2017	E	Update for monitoring one stop operator and PII for mobile outreach services	12/08/2017
Deb O’Neil	06/04/2018	F	Update to align with state’s oversight and monitoring policy WSP No. 183-01	08/10/2018