NWPA WDB POLICY #200
Rev. Level: A

# Monitoring & Oversight Policy

**Purpose:**
This policy explains the process to ensure compliance with applicable federal, state, and local statutes, regulations, policies, and terms of any applicable awards or sub-awards.

**Audience:**
This policy pertains to:
- NWPA Job Connect
- Title I Provider
- TANF Youth Development Program Funds Provider
- One-Stop Operator
- Sub-grantees

**Background:**
Non-federal entities receiving federal workforce funds must provide oversight of workforce programs, administration, activities, and funds. Monitoring and oversight is designed to ensure performance goals are met and funds are used for authorized purposes in compliance with federal requirements and consistent with terms and conditions of the award or sub-award. The Workforce Innovation and Opportunity Act (WIOA) requires monitoring and oversight, as does the Pennsylvania Department of Labor and Industry. Risk Assessment is included in oversight and monitoring.

**Policy:**
NWPA Job Connect Monitor will complete the following items each program year:
- Develop a written plan for local oversight to be updated annually.
- Develop a tool to support and ensure all required items are monitored and updated as needed.
- Perform risk assessments on sub-recipients.
- Perform and document regular oversight of WIOA Title I programs, TANF Youth Development Funds programs, grant subawards.
- Report and discuss monitoring activity results with the full board.
- Perform an annual review of monitoring to determine effectiveness. Make changes as needed.

**NWPA Job Connect Responsibilities:**
NWPA Job Connect Monitor will oversee and monitor the following items: (See Appendix A for specific items under each category)

- Administrative items, at least one (1) time a year
- Programmatic items, at least quarterly

- Fiscal items, at least quarterly
- Operations, at least one (1) time a year
- Risk Assessment, at least one (1) time a year

**Methods of Oversight:**
Oversight includes reviewing files, staff interviews, and information in CWDS to identify compliance violations, questioned costs, potential weaknesses in performance, best practices, identifying potential or recurring issues, and to ensure subrecipients are compliant in programs, operations, and finances.

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

- On-Site Visit
- Desk Reviews
- Random Sampling
- Surveys

**Monitoring Tools:**
NWPA Job Connect Monitor will create/update local monitoring tools to ensure all required items are reviewed. The monitoring tool must include the following information:

- Name of the agency
- Name of the individual performing the monitoring
- Date of the monitoring/oversight activity
- Services or activities provided
- Total amount of the contract and sources of the funding
- Staff interviewed
- Summary of the results that include program strengths, concerns, deficiencies, areas for technical assistance.

Note* Technical assistance will be provided, as needed, to help improve program operations, facilitate the implementation of corrective action, or provide information.

**Local Oversight Plan:**
See Appendix A for the local oversight plan that includes the timeline for oversight activities and the items that will be reviewed/monitored.

## Risk Assessment:

WIOA requires a system of accountability to ensure an optimum return on federal funds invested in programs and activities administered by local workforce development areas. The following items will be addressed in our local Risk Assessment:

**Assessing the risks.** Consideration will be given to which subrecipient(s) involve the most risks that may expose NWPA Job Connect to adverse consequences.

**Identifying the frequency in which to monitor contractors.** Consideration will be given to the level of vulnerability to the local area or NWPA Job Connect if the subrecipient(s) compliance with programmatic and fiscal system requirements is not systematically and regularly monitored.

**Identifying the factors used to assess risk.** At a minimum, the following will be answered and evaluated:

- Whether the service provider is new to operating or managing state or federal funds, or has not done so within the past five years
- Whether the contractor has new key personnel or substantially changed systems
- The extent and results of federal awarding agency monitoring (e.g., if the contractor also receives federal awards directly from a federal awarding agency)
- Whether the provider lacks effective operational and fiscal procedures and controls
- The results of previous audits including whether the contractor receives a Single Audit in accordance with 2 CFR 200, Subpart F – *Audit Requirements* of this part, and the extent to which the same or similar subaward has been audited as a major program; and
- What is the contractor's share of the local area's allocation?

NWPA Job Connect will include any additional steps, risk factors, and questions deemed necessary to ensure a comprehensive risk-assessment methodology.

**Projecting the risk.** NWPA Job Connect will assign well-defined, supported point values to the scoring system. The numerical ratings will be used to determine the overall risk associated with, and how often to monitor, each contractor. NWPA Job Connect will classify service providers as high risk, medium risk, or low risk.

**The scoring system for service provider risk assessment includes:**

1) **Does the subrecipient have prior experience with the same or similar subawards?**
    a. 3 points = New program for this entity; managed other state or federal awards
    b. 2 points = Prior experience with program, but managed for less than 3 years
    c. 1 point = Prior experience with same award

2) **Does the subrecipient have new personnel or new or substantially changed systems?**
    a. 3 points = Turnover greater than 30% and/or staff reduction greater than 10%
    b. 2 points = Turnover 10-30% and/or staff reduction under 10%
    c. 1 point = Turnover less than 10% and no staff reduction

3) **Does the contractor have a significant history of oversight/monitoring findings since the contractor has been in place?**
    a. 3 points = More than one instance of disallowance
    b. 2 points = A single instance of disallowance
    c. 1 point = No disallowances have occurred

4) **Does the subrecipient lack effective operational and fiscal procedures and controls?**
   a. 3 points = If more than one instance of noncompliance
   b. 2 points = A single instance of noncompliance
   c. 1 point = Full compliance

5) **What is the extent of the recent single audit?**
   a. 3points = If substantial oversight findings occurred within past 2 years
   b. 2 points = If some oversight findings occurred within past 2 years
   c. 1 point = No oversight findings occurred in past 2 years

6) **What is the contractor's share of the local area's allocation?**
   a. 3 points = $8M - $15M
   b. 2 points = $1M to $7,999,999 M
   c. 1 point = $0 - $999,999

7) **Complaints or Incident Reports**
   a. 3 Points= Entity has a current complaint or active OIG Investigation
   b. 2 Points= Entity had a complaint or incident in the last three years that resulted in an investigation.
   c. 1 point= No active complaints or incident reports

8) **Prior Monitoring Findings, excluding disallowances**
   a. 3 Points= Significant or unresolved findings annually
   b. 2 Points= Significant or unresolved findings in the past two years
   c. 1 Point= No significant findings for the past three years

9) **High Risk Designation or Reimbursements**
   a. 3 Points= Entity is currently on High -Risk Designation or on Reimbursement
   b. 2 Points= Entity was released from High-Rish or Reimbursement within the past 3 years
   c. 1 point= Entity has not been on High-Risk or Reimbursement within the past 3 years.

**Local Risk Assessment Protocol**

**Protocol**: Based on the risk level identified, the risk assessment will be used to determine any measures needed to be taken to mitigate risk. The following control actions will be implemented based on the risk category.

**High Risk**: 22-27 Points

- Mandatory quarterly conference calls with NWPA Job Connect staff discussing factors affecting risk level.
- If deemed necessary, a follow-up on-site monitoring review to be performed by NWPA Job Connect staff.

- Mandatory participation in technical assistance training session(s) related to risk factors

**Medium Risk:** 15-21 Points

- Any corrective action activities implemented by NWPA Job Connect to reduce or minimize risk such as required pre-approvals and authorizations, reconciliations, submission of source documentation.
- Mandatory participation in technical assistance training session(s) related to risk factors.

**Low Risk:** 9-14 Points

- No additional actions required

NWPA Job Connect staff will provide technical assistance to subrecipients in enhancing program performance and accountability. If deficiencies or concerns have been identified, it will be necessary to work closely with the contractor in correcting these issues.

## Monitoring & Oversight Reporting Requirements:

NWPA Job Connect Monitor will submit a written monitoring/oversight report within thirty (30) days of completion. The report will contain the following information:

- Identified findings/concerns
- Promising practices/areas of success
- Recommendations for corrective actions and program quality enhancements
- Timeline to complete action steps.

The subrecipient must submit their Corrective Action Plan to the NWPA Job Connect Monitor with 30 days of receipt of the monitoring report. The plan must identify actions to correct the findings and the time frame to complete.

NWPA Job Connect Monitor will provide a monitoring report overview at the Monitoring Committee and full board meetings.

Monitoring reports will be maintained for monitoring purposes.

## Monitoring Appeals:

If the subrecipient disagrees with any findings/corrective actions, they may file an appeal within 30 days of receiving the report. The formal request will be sent to the NWPA Job Connect Monitor and Director. The appeal must define the area of concern, and the subrecipient must provide documentation to support the concern.

**Appeal Process:**
**Step 1:**

1. NWPA Job Connect Monitor and Director will review the monitoring report, appeal letter, and all documentation.

2. NWPA Job Connect Monitor and Director will meet with provider and discuss.
3. If an agreement is reached, information will be updated and provided to all parties.

**Step 2: (if needed)**

1. If a resolution is not reached in Step 1, NWPA Job Connect Monitor or Director will convene the Fiscal & Monitoring (F&M) Committee.
2. The original monitoring report and supporting documentation, appeal documentation, and any information from Step 1 will be provided to the committee members for discussion.
3. F&M Committee decision will be sent to the provider via email within ten (10) business days after the committee meeting.

**Step 3: (if needed)**

1. If the provider disagrees with the F&M Committee's decision, the provider may appeal to the NWPA Job Connect Executive Committee.
2. Executive Committee will convene to discuss all the information.
3. Executive Committee's final decision will be sent to the provider via email within ten (10) business days of the meeting.

**Note* All meeting notes, emails, documentation pertaining to the monitoring and appeal will be saved for monitoring purposes.**

## REFERENCE

WSP No. 183-01 (Change 1) Oversight and Monitoring
WSP 184-02 (Change 1) Sanctions
WIOA Section 183
20 CFR 683.410
20 CFR Part 200

## HISTORY

| Name | Date | Rev. Level | Description of change | Effective Date |
|---|---|---|---|---|
| Susan Richmond | 2/26/2026 | A | Combined Oversight & Monitoring, Risk Assessment, and Local Monitoring Appeal policies/restructured policy/reworded items | 8/1/2026 |

**Recissions:**

NWPA Job Connect Risk Assessment Policy
NWPA Job Connect Oversight & Monitoring

# Appendix A Local Monitoring Plan

## Monitoring Reporting Schedule: PY 2026-2027

| Oversight Responsibility: | To be completed by: | Month/Committee to be presented to: | Month to be presented to the Board and CLEO's: |
|---|---|---|---|
| 1st Quarter Review | September | September/ Fiscal & Monitoring Committee | October Board/CLEO Meeting |
| Administrative | December | December/Fiscal & Monitoring Committee | January Board/CLEO Meeting |
| 2nd Quarter File Review | December | December/ Fiscal & Monitoring Committee | January Board/CLEO Meeting |
| 3rd Quarter Review | March | April/ Fiscal & Monitoring Committee | May Board/CLEO meeting |
| Fiscal and Reporting | March | April/ Fiscal & Monitoring Committee | May Board/CLEO Meeting |
| Risk Assessment | March | April/ Fiscal & Monitoring Committee | May Board/CLEO Meeting |
| 4th Quarter File Review | June | June/ Fiscal and Monitoring Committee | July Board/CLEO Meeting |
| Programmatic | June | June/Fiscal & Monitoring Committee | July Board/CLEO Meeting |

**Monitoring Details:**

**Administrative Oversight**

- Local governance
- Local plans and agreements
- Local board compliance and certification
- PA CareerLink® certification
- Organizational structure
- Administrative policies and procedures
- Sub-recipient capacity to provide oversight
- ADA compliance
- Non-discrimination and civil rights provisions; and
- Equal opportunity requirements
- PA Sunshine Act compliance
- Right-to-Know law compliance
- Training by EO Officer
- Collection and submission of quarterly EO reports
- Maintenance of LEP plans
- One Stop Operator
    - Firewall in place when required

**Fiscal and Reporting**

- Fiscal agent responsibilities and activities
- Fiscal policies and procedures
- Fiscal plans and agreements
- Sub-recipient monitoring activities
- Verification of OJT/ITA/WEX invoices
- Cost allocation and allowability
- Resource sharing
- Cash management practices
- Procurement practices
- Internal controls
- Reporting requirements
- Closeout procedures
- Audits
- Sub-contract compliance
- Program income and reporting
- Property management
- Record retention
- GAAP adherence
- Payroll administration

**Programmatic Oversight**

- Program management and standards
- Program policies and procedures
- Service delivery
- Participant eligibility
- Performance measures and program outcomes
- Service to priority and special populations
- Record retention and case file maintenance
- Sub-recipient monitoring activities
- Supportive services and need related payments
- Youth activities
- Risk Assessment of Title 1 & EARN
- Data analysis
- Data element validation
- EO elements and standards
- CWDS Foundation Training
- CWDS Required Trainings

**File Review**

- File reviews, including desk reviews, will be conducted quarterly during the program year and will include all populations (Youth, Adult, DW and TANF Youth). The number of files for each population may vary based on the focus needed during the time of review but all populations will be reviewed in some capacity.

- Verify OJT/ITA contracts and agreements along with proper invoicing and backup documentation is included in files.
- Verify RAPIDs report is in Registered Apprenticeship Participant files.
- Quarterly on-site visits at MOU Mobile sites. Each quarter we will visit half of the counties.
- NWPA Job Connect staff may also conduct random site visits throughout the program year.