



West Tennessee Workforce Development Board

www.westtennesseecareers.org

P. O. Box 264
1527 White Avenue
Henderson, TN 38340
Phone: 731-989-0533
Fax: 731-983-3149

Craig S. Butler
Board Chair

Jimmy Bell
Director

Local Workforce Development Area 11 Policy Memorandum # 17-18

Subject:

Monitoring

Purpose:

The purpose of this memorandum is to establish monitoring procedures that will comply with the requirements of the Workforce Innovation and Opportunity Act of 2014 (WIOA).

References: WIOA Section 185(c)(3); CFR 683.410; 2 CFR 200

Background: WIOA Section 683.410(a) states that "Each recipient and sub-recipient of funds under Title I of WIOA must conduct regular oversight and monitoring of its WIOA program(s) and those of its sub-recipients and contractors as required under Title I of WIOA, as well as under 2 CFR 200, including 2 CFR 200.327, 200.328, 200.331, and Department exceptions at 2 CFR part 2900, in order to:

1. Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in WIOA and the regulations in this part
2. Determine whether there is compliance with other provisions of WIOA and the WIOA regulations and other applicable laws and regulations;
3. Assure compliance with 2 CFR part 200; and
4. Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of Section 188 of WIOA, including the Assistive Technology Act of 1998 (29 U.S.C. 3003).

The Workforce Innovation and Opportunity Act also states "each local board shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title".



® A UNITED WAY AGENCY OF WEST TENNESSEE INC. AGENCY

Policy:

It is the policy of West Tennessee Workforce Development Board that LWDB-11 staff will carry out the charge of WIOA Section 683.410(a) regulation through regular communication with LWDB-11's Title I One-Stop Operator, both collecting and disseminating data. This informational data will be shared with the Board throughout the program year.

LWDB Monitoring Procedure:

LWDB-11 Board staff has requested a weekly report from One-Stop Operator who also executes Delivery of Services for the area regarding the following by program and contract:

- Number of new enrollees
- Number of exits
- Number currently active
- Obligated expenditures
- Amount expended (on participants)

LWDB-11 monitoring staff will monitor participant files periodically (at least once a quarter) to ensure eligibility of participant, all required documentation has been uploaded into the Virtual One-Stop (VOS) system, and all activities are appropriate for each program. Results of the monitoring review will be forwarded to the One-Stop Director with a request for a corrective action plan within thirty (30) days of the report should there be any findings. The One-Stop Director will inform Career Specialists of any actions they need to take in order to correct findings and submit the corrective action taken to LWDB-11 monitor within the assigned 30-day period.

Fiscal monitoring is performed upon submission of each invoice requesting reimbursement. Monthly invoices should be received from the One-Stop Operator and provider of services by the fifth (5th) business day of subsequent month. Invoices will be reviewed by LWDB-11 staff to ensure backup documentation is submitted and that all costs submitted for reimbursement are allowable. Should the invoice contain any unallowable costs, the amount of unallowable charges is deducted from the total invoice before any payment is made. After review by LWDB-11 staff, invoices will be submitted to the fiscal department where a second review will be completed prior to payment.

Board staff will also monitor One-Stop Operator regarding the following:

- Conflict of Interest
- Nondiscrimination
- Performance measures
- Management of One-Stop Centers
- Coordination of partner programs
- Integration of available services and coordination of programs with all partners
- Compliance with WIOA and LWDB-11 policies
- Forty percent (40%) Minimum Participant Cost Rate
- Seventy-five percent (75%) expenditure rate for out-of-school youth
- Twenty percent (20%) work experience expenditure rate for youth
- Youth elements are being met
- Inventory

The above-mentioned procedures will be conducted through (but not limited to) the following:

- Desk reviews
- On-site visits
- Interviews with:
 - WIOA participants
 - Area employers
 - One-Stop Operator and service delivery staff
 - Incumbent Worker Training (IWT) contractors
 - On-the-Job Training (OJT) contractors
 - Apprenticeship contractors

Results of each separate monitoring review will be issued to the One-Stop Director within thirty (30) days of completion of the review. One-Stop Operator will have thirty (30) days to respond with a corrective action plan if required. Follow-up will be conducted by LWDB-11 staff to ensure all corrections/concerns have been achieved.

Technical assistance will be given by LWDB-11 staff to the One-Stop Operator as requested and to bring them into compliance with WIOA and LWDB-11 policies.

Action:

LWDB-11 staff will perform monitoring as follows:

- File Maintenance (at least quarterly)
- Contracted Services (OJT, IWT, Apprenticeship, etc.) (at least once annually)
- AJC Operations (at least once annually)
- Financial (each submission of request for reimbursement)
- Compliance with WIOA (at least once annually)

One-Stop Operator / Service Delivery will also employ a staff person as Monitor. This staff person will check participant files including (but not limited to) the following:

- Appropriate program enrollment
- File contents
- Backup documentation uploaded into VOS
- Appropriate activities in VOS
- Data validation elements
- Appropriate funding

Contact:

Questions regarding this policy should be addressed to Jimmy Bell, LWDB-11 Director, at SWHRA, 1527 White Avenue, P.O. Box 264, Henderson, TN 38340. Phone: (731) 983-3688. Email: jbell@swhra.org.

Effective Date: July 1, 2017

Expiration Date: Until further notice

Approved:



Jimmy Bell, LWDA-11 Director