
Western Arkansas Workforce Development Area Policies and Procedures

TITLE	Monitoring
NUMBER	P0003-24
TYPE	Policy - Programmatic
APPROVING AUTHORITY	Western Arkansas Planning & Development District
EFFECTIVE DATE	4/30/2024
NEW/REPLACED	New

Policy

Each recipient and subrecipient of funds under title I of WIOA and under the Wagner-Peyser Act must conduct regular oversight and monitoring of its WIOA and Wagner-Peyser Act program(s) and those of its subrecipients and contractors as required under title I of WIOA and the Wagner-Peyser Act, as well as under 2 CFR part 200, including 2 CFR 200.327, 200.328, 200.330, 200.331, and Department exceptions at 2 CFR part 2900, in order to:

- 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;
- Determine whether there is compliance with other provisions of WIOA and the WIOA regulations and other applicable laws and regulations;
- Assure compliance with 2 CFR part 200; and
- Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of sec. 188 of WIOA, including the Assistive Technology Act of 1998 (29 U.S.C. 3003).

Procedure

1) WIOA MONITORING & OVERSIGHT

WAPDD will adopt the State Workforce Development Board and Arkansas Department of Workforce Services Monitoring Procedures and Monitoring Tools to be utilized by all entities for WIOA purposes.

2) DOCUMENTATION TO BE UTILIZED

The Monitored Agency Documents that may be utilized by the Monitoring Entity include the following: Previous Monitoring Reports, Letters of Concern, WIOA Four-Year Plan, Subgrants, AWIS documents, WIOA Act and Regulations, Audit Report, Follow-Up Reports, Time Sheets, Internal Monitoring Reports, Board Information, Internal Policies and Procedures, Agreements/Contracts/Sub-Awards, Financial Reports and all Related Information, and Client Files.

3) MONITOR PREPARATION

The monitor will prepare for entrance conference by sending a letter to monitored entity and provide at least (1) week of advanced notice. The letter should reference dates of monitoring, instrument to be used, time of entrance conference, length of review, and approximate date of exit conference, anticipated training/service provider field visits, and filed to be utilized during

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review.

4) MONITORED PREPARATION

The monitored entity will designate a contact person. This may be the Director or person appointed but will be the person to whom general questions will be addressed and the person who should be notified if any problems are discovered. This contact must be available during review. The contact will notify training/service providers of dates and times for field monitoring, schedule interviews, and provide documentation. The monitored entity will assign a working space for the monitor during all visits. All pre-requested files must be available to monitor upon entry.

5) ENTRANCE CONFERENCE

The monitor will again brief the monitored entity on the scope of the monitoring. The monitor will explain instrument, needed documents, dates of review, and the time/date for exit conference, and invite questions.

6) MONITORING

Monitor will review requested documentation and note observations on the monitoring instruments. If during the review problems are noted but are minor, isolated and do not indicate a trend, they can be corrected on-site as long as the staff understand why the condition is a problem and how it is to be avoided in the future. Problems that do not involve issues of noncompliance will be covered through informal discussion between the monitor and the monitored entity contact person. Depending on the seriousness of such a problem, the monitor may write a management concerns letter to the entity.

7) TRAINING/SERVICE PROVIDER MONITORING

The monitor will be introduced to the contact person previously identified by the monitored entity. If the contact person is unavailable, the monitor will contact the supervisor, if after reasonable effort is made, and contact or supervisor cannot be found, the monitor can begin interviewing clients.

The monitor will have at all times the right to interview both youth and adult clients. If problems are indicated during interviews, it shall be communicated immediately to monitored entity.

The monitor will be provided with access to site records and review them in the presence of training site personnel.

In addition to verbal interviews and record review, the monitor will attempt to observe aspects for the training environment that may not have surfaced. Examples would include, but not be limited to, condition and appropriateness of training equipment, safety.

8) PRE-EXIT PREPARATIONS

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The monitor will assemble all collected data and evaluate findings/concerns, determine content and validity and establish the number of occurrences. Monitor will research findings and citations from the law and determine if material enough for actual finding. All findings will be compared to previous monitoring reports to determine frequency of occurrence in the past. Monitor will prepare notes and supporting documentation for exit conference and list any requested information that has not been received to date for the information of the monitored entity director. Monitor will schedule the exit conference with the director.

9) EXIT CONFERENCE

The monitor will explain all issues considered to be problem areas/findings. The monitored entity will be given the opportunity to further clarify monitor's issues. The monitor will accept any documents provided by the monitored entity that are relevant to the reported problems/findings. Monitor will describe required dates for submission of the report and all responses.

10) MONITORING REPORT

A written monitoring report will be issued to the monitored entity and will contain findings for which sufficient documentation was not provided during the monitoring visit/exit conference; and findings for which corrective action is requested. All findings will be referenced to the WIOA Act, Regulations, Plans, or other requirements that have been violated.

The report will be mailed to the monitored entity within 30 days following the date of the exit conference. The monitored entity will then have 7 days from receipt to review for information that may have been overlooked that may have a significant impact. If WAPDD is not notified within the 7-day period, the report will be considered final. A response and course of action related to findings will be due from the monitored entity within 30 days of the final report.

11) CORRECTIVE ACTION

The monitored entity will submit a management response, within 30 days of the dated report, with requested clarification; corrective action taken or being taken for each finding; and will provide documentation to support management response.

The monitor will respond to the monitored entity, within 15 days of the management response postmark, accepting the corrective action and closing the report with a written letter within 10 days, or requesting additional information. If additional information or documentation is requested, the process will be repeated, except that the monitored entity will only have 15 days from the postmarked WAPDD response to forward an additional management response.

12) CLOSING REPORT

If after (2) responses from the monitored entity, corrective action is determined to be inadequate and findings are unresolved, a final determination will be written which will include identification of the unresolved issues and steps to be taken. Within 10 calendar days, copies of the final determination will be sent to the monitored entity, the Local Workforce Development

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Board, the Local CEOs, and if necessary, the State Workforce Development Board.

If sanctions are imposed, the monitored entity has the option of appealing through the grievance process.

Approval Signature:

John Craig, Board Chair