

THE MISSISSIPPI PARTNERSHIP WORKFORCE DEVELOPMENT AREA

WIOA PROGRAMMATIC & FISCAL MONITORING POLICY

Revised May 25, 2017

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I. Scope and Purpose

This Policy sets forth the requirements for the Mississippi Partnership Workforce Development Area policies for the monitoring of all subgrantees receiving Workforce Innovation and Opportunity Act (WIOA) funds in accordance with Sections 183(a-c) of the WIOA and Federal regulations 2 CFR Part 200 Subparts Federal Acquisition Regulations (FAR) 31.2 of the Final Rule.

Audit Regulations, 2 CFR 200.501-512, shall be applicable for non-profit and for-profit entities who expend \$750,000 a year in federal awards from all sources.

II. Local Workforce Development Area Requirements

A. Monitoring Policy

In accordance with WIOA Section 116(d)(4), Three Rivers Planning & Development District (TRPDD), under the guidance of the local board, in partnership with the chief elected official, is responsible for monitoring with respect to local programs of youth activities authorized under section 129, local employment and training activities authorized under section 134, and the one-stop delivery system in the local area.

WIOA Section 184(b)(3&4) and 2 CFR 200 parts 330-332 of the Federal regulations require each recipient and subrecipient of WIOA funds Title 1 funds to conduct monitoring of the WIOA activities of its subrecipients in order to:

- Determine whether expenditures have been made against the cost categories and within the cost limitations specified in WIOA and Federal regulations;
- Determine whether there is compliance with all applicable regulations; and
- Provide technical assistance as necessary and appropriate.

1. On-Site Reviews

TRPDD on-site reviews will be conducted pursuant to established standard operating procedures to ensure compliance with the WIOA, Federal regulations, State laws, contractual agreements, State & local policies, OMB circulars, cost principles, and when

applicable, Federal Acquisition Regulations (FAR). An on-site review is conducted consisting of:

- An entrance conference to brief agency officials on the scope of the review and to make appropriate arrangements;
- A review of administrative, fiscal, and programmatic systems and transactions.
- Performance of testwork, based on a review and examination of WIOA records and interviews; and
- An exit conference to inform agency officials of monitoring results.

2. Basis for Monitoring of Subrecipients

- Program goals and objectives
- Program equality
- Procurement
- Fiscal accountability, including
 - Standard for grantee financial management system
 - Subgrantee fiscal controls and accountability
 - Subgrantee record retention
 - Allowable cost
 - Examination of actual expenditures against cost categories and cost limitations
 - Internal financial management practices
 - Cost allocation
 - Property management
 - Internal monitoring
- Labor standards
- Audit/audit resolution process
- Grievance procedures
- Equal opportunity
- Provisions of the American with Disabilities Act
- Participant eligibility determination as applicable
- Property management
- Internal monitoring
- Administrative procedures
- Program performance assessment
- Youth program elements, if applicable

- Other programmatic areas, such as participant assessment, supportive services payment system, participant wages and benefits
- Programmatic accountability
- Prevention of fraud and abuse
- Administrative staff and personnel standards

3. Frequency

Subgrantee monitoring shall be conducted a minimum of once every program year or during the subaward period.

B. Monitoring Procedures

1. Monitoring Schedule

TRPDD will develop the monitoring schedule for each program year no later than October 1st of each year. The schedule shall include the subgrantee's name, contact numbers, planned dates of review, and names of individual to perform the reviews. Specific dates of monitoring and the subgrantee's name and project location shall be included on the monitoring schedule. The monitoring schedule shall be submitted to OGM.

2. Review Notification

TRPDD will notify subgrantees in writing of scheduled visits ten (10) days in advance of monitoring visit, except when an unannounced monitoring visit is deemed necessary. A checklist, which highlights the major areas to be reviewed, is transmitted with the notification letter.

3. Desk Review Instrument

TRPDD will complete a written desk review monitoring instrument preceding the on-site monitoring visit. The desk review instrument will help ensure that all pertinent records are reviewed prior to each visit.

4. Monitoring Instrument

TRPDD utilizes the DOL and OGM instruments and instructions as well as the Mississippi Partnership's WIOA Policies when conducting on-site reviews. Additionally, the TRPDD has developed objective monitoring instruments tailored for specific needs. These instruments were developed with consideration of general

requirements which apply to all WIOA subcontractors, as well as specific requirements as determined by the nature of the contract under review. A copy of the monitoring instrument will be provided to all subgrantees prior to the monitoring visit.

5. Documentation of Findings

All findings resulting from a monitoring review shall be documented in writing and shall include a description of the specific violation of Federal or State laws, policies, regulations, and/or contractual provisions.

6. Monitoring Report

After each review, a monitoring report will be prepared detailing the results of the monitoring visit. The report will be completed within fifteen (15) working days after the visit. Indexed working papers will also be prepared to provide supporting documentation for testwork performed and for any findings. The monitoring report will be transmitted to the entity for review, and appropriate corrective action will be requested, if necessary.

The report details any significant findings and presents recommendations for appropriate corrective actions. The report is transmitted to the agency in question. At minimum, the report will contain the following elements:

- a. A face page to be signed by all participating monitors and the signature of supervisory level staff or the executive director;
- b. The dates of the review and areas covered during the review.
- c. A sequential listing of findings and recommendations, if applicable. Each finding shall consist of an objective narrative description of the deficiency or violation of Federal or State laws, policies, regulations, and/or contractual provisions;
- d. Each finding shall be followed by a recommendation which set forth the most appropriate action to correct the deficiency or violation noted in the finding.

7. Corrective Action

If any findings were noted during the on-site review, a corrective action response will be required within 10 days from date of the monitoring report. Upon receipt of the entity's corrective action plan, the monitors will review the response and comment on the acceptability of the proposed corrective action. If the corrective action plan is deemed acceptable, the file will be closed. If the corrective action plan or any part thereof is unacceptable, additional corrective action shall be requested. The file will remain open until all corrective action has been accepted.

8. Acceptances/Non-Acceptances of Corrective Action

Monitors or designated staff will review the agency's response to the report and comment on the acceptability of proposed corrective action. Notification of the determination shall be provided to the subgrantee within 30 working days of receipt of the proposed corrective action plan.

If the proposed plan is not accepted, Three Rivers PDD may require submission of a subsequent plan to be received within 30 days from the date of notice.

If the subsequent plan is deemed unacceptable, Three Rivers PDD may again request submission of a new plan within a specified timeframe for take other action as deemed appropriate relevant to the circumstances.

Failure of the subgrantee to respond appropriately may result in sanctions, including but not limited to, no new enrollments being permitted and/or all funds requested will be withheld until receipt of said letter.

9. Unannounced Visits

TRPDD will conduct unannounced visits, if deemed necessary.

10. Follow-up Monitoring and Verification of Corrective Action

All findings requiring corrective action will necessitate follow-up procedures to be conducted.

These follow-up procedures will consist of verification by letter and/or a second monitoring visit. Documentation of the corrective action will be retained in the appropriate file.

11. Monitoring Files

A comprehensive monitoring file will be maintained at the Three Rivers PDD office for each monitoring visit that contain all records related to each monitoring visit. These files contain at a minimum:

- a. Letter announcing monitoring visit, except when an unannounced visit is deemed appropriate;
- b. Completed desk review instrument;
- c. Signed monitoring report;
- d. Completed monitoring instruments;
- e. Letter transmitting report to subgrantee;
- f. Response from subgrantee, when appropriate;
- g. Letter to subgrantee accepting or rejecting corrective action, when appropriate;
- h. Working paper file to include supporting documentation.

III. Desk Monitoring

There may be times when it may not be practical or cost effective to conduct an on-site monitoring visit of a subgrantee. The Office of Grant Management (OGM) will allow for the limited use of desk monitoring of some subgrantees if all of the following criteria are met:

- A. The training program has five or fewer participants;
- B. The total cost of the contract or total cost of the training is \$25,000 or less;
- C. Adequate documentation is obtained and maintained in monitoring files to document:
 1. Eligibility;
 2. Time and Attendance;
 3. Trainee progress reports;
 4. Documentation of completion of training program;

- 5. License or certificate earned;
 - 6. Participant medical and accident insurance;
 - 7. Placement and wage information;
 - 8. Financial Records
- D. There are no known problems or issues that would warrant an on-site visit; and
- E. It has been determined and documented that desk monitoring is the most practical means of monitoring the subgrantee.

IV. Effective Date

This policy is effective May 25, 2017.