



Bay Consortium Workforce Development Board

Policy Number: 11-03
Effective Date: November 9, 2011
Revised Date: July 1, 2016
Title: Monitoring Policy

Purpose

To establish a monitoring system which contains acceptable standards for ensuring accountability, provides technical assistance as necessary and appropriate, and defines the criteria that will be used to monitor sub-recipients and contractors in the Bay Consortium Workforce Development Board (BCWDB) Area XIII.

Policy Statement

Through regular oversight and monitoring of WIOA sub-recipients and contractors, the BCWDB will assess compliance with regulations and policies established by the Workforce Innovation & Opportunity Act (WIOA), Virginia Community College System (VCCS), BCWDB, as well as compliance with the terms and conditions of contracts between BCWDB and Program Operators. Monitoring activities will be conducted at least once per year, and appropriate corrective action will be administered when evidence indicates a possible violation of one of the aforementioned regulations or policies. The major systems of compliance review include, but are not limited to: administrative, financial, and program.

Compliance monitoring will be conducted by reviewing records and documents maintained by the BCWDB administrative office on each program or contract, conducting onsite reviews and desk reviews of procedures, records, and documents maintained by the contractor or program operations staff, and by submission of written reports of findings, including corrective action recommendations if appropriate.

General Monitoring Procedure

- A written monitoring checklist is utilized to ensure all acceptable standards of accountability are reviewed.
- Compliance monitoring activities are scheduled in advance with each Program Operator.
- Reports, records, and documents maintained by the BCWDB on each contract or program are reviewed for completeness, accuracy, and timeliness of submission. Such reports, records, and documents include but are not limited to: the approved contract and modifications thereto and/or program specifications, correspondence and reports maintained by the contracting officer in the



contract file, transmittal of individual participant records, previous monitoring reports, and applicable corrective plans.

- Each contract or program is monitored at the site of operation. On-site monitoring may include but is not limited to: an entry interview with the Program Operator's designated representative, a review of applicable written policies and procedures, staff and participant interviews, a review of participant records, a review of financial procedures/records/documentation, a review of performance and follow up procedures/records/documentation, and an exit interview with the Program Operator's designated representative. Technical assistance may also be provided in order to ensure continuous improvement. A draft monitoring report will be generated within 30 days of the on-site monitoring visit for the Program Operator to review, upon completion of the draft report review, a final report will be generated within 7 days for the Program Operators to respond to.
- A written monitoring report is completed on each monitored contract or program and submitted to the Executive Director, who subsequently will distribute the report to the Program Operator. The written report includes but is not limited to: Findings and recommendations on identified deficiencies as well as administrative concerns regarding program operations. The Executive Director will request a response from Program Operators. Program Operators will respond with all corrections within 30 days.
- Oral reports may be made to the Executive Director when apparent deficiencies are identified which may need immediate action. Such deficiencies include but are not limited to: Inaccurate or insufficient financial management procedures, inaccurate or insufficient participant eligibility determinations, child labor law violations, or non-compliance with the terms and conditions of the contract or other applicable federal, state, board, or WIOA requirements.
- The Compliance Review Officer will review Program Operator's responses to the monitoring report and will determine if action taken by the Program Operator is sufficient to satisfy the recommendations contained in the monitoring report. Additional information may be requested if deemed necessary by BCWDB staff and staff may conduct follow up monitoring reviews/visits to ensure corrective action has been initiated, is on-going, or has been completed. Once it has been determined that deficiencies have been corrected, the Program Operator will be notified that no additional action is necessary.

Desk Reviews

Desk reviews are conducted by BCWDB staff to ensure that the performance objectives of Workforce Investment Area are attained within reasonable limits. These performance reviews are used to determine whether program design is adequate to meet the needs of the eligible population and whether program design is adequate to attain planned objectives. Performance reviews are conducted at regular intervals on each contract or program. Participant and financial



status reports completed and submitted monthly by Program Operators are reviewed on the basis of actual cumulative data versus planned data, actual performance rates versus planned rates, and actual performance relative to performance standards criteria. In addition, reports generated from the Virginia Workforce Connection are used to monitor program performance. BCWDB staff may request performance reports or information from Program Operators for the purpose of analyzing performance data or to respond to performance related inquiries.

Special Investigations

Special investigations are conducted when information is received which indicates possible fraud, abuse or alleged criminal activity. The investigation is designed to provide the BCWDB and the Executive Director with sufficient information to justify a decision to notify the appropriate legal authorities.

Processing Procedures

- The Executive Director notifies the BCWDB Chair and the State WIOA office or Department of Labor upon receipt of any request to conduct a special investigation and/or upon the initiation of any special investigation.
- The BCWDB Chair appoints specific persons as appropriate to conduct special investigations.
- Assistance or advice from other individuals approved by the Executive Committee may be solicited during a special investigation.

Corrective Action and Follow-up

Corrective action and follow-up is conducted to eliminate reported violations. Corrective action plans are developed and implemented for the purposes of alleviating reported inadequacies in acceptable operating procedures, standards of accountability or program performance standards.