

South Central Iowa Monitoring Policy

Approved Date: September 28, 2021

Effective Date: September 28, 2021

Background

The South Central Iowa Local Workforce Development Board (LWDB) on behalf of the Chief Lead Elected Official (CLEO) for the South Central Iowa Workforce Area, must conduct monitoring of all contracts at least annually or, for contracts lasting less than one year, once during each contract term for financial and programmatic compliance.

The LWDB must also ensure that the use, management, and investment of funds for workforce development activities are consistent with 2 CFR 200 and maximize performance outcomes under section 116 of the Workforce Innovation and Opportunity Act (WIOA).

LWDB Primary Responsibilities

Per IWD Chapter: 9 Section: 2.1 the LWDB must conduct oversight, which may include, but is not limited to:

- Administration and Governance
- Workforce Development Program Delivery
- Fiscal Management
- Performance and Reporting Management
- Additional review areas, as applicable

Monitoring Schedule

All contracts shall be monitored by the staff of the LWDB and/or fiscal agent for each program, at least annually for all WIOA related and certain non-WIOA related operations in the South Central Iowa Workforce Area. When an onsite review will take place, the sub-recipient shall be notified of the intended dates of scheduled monitoring at least thirty (30) days prior to the date of the visit whenever possible. The LWDB reserves the right to conduct unscheduled monitoring in conjunction with or in response to investigations of misfeasance and/or malfeasance or previous monitoring findings.

Programmatic, fiscal, and operational monitoring will be conducted to measure compliance with WIOA regulations, Iowa Workforce Development (IWD) and local policies. Monitoring will include a comprehensive examination of compliance issues cited in prior state and local reviews and the determination where corrective measures were taken to address and resolve those issues.

Responsible Representatives

- The board executive director or designated staff will perform the programmatic monitoring of the subrecipients, or designee, along with oversight of the fiscal agent.

Oversight Methods

The LWDB may utilize any of the following methods of monitoring oversight

- Random sampling
- Risk assessment
- Desk review
- On-site visit
- Questionnaires and interviews of customers, employers, One-Stop Operators
- Customer satisfaction survey
- Other necessary methods, as applicable

The LWDB is not restricted to using only the methods mentioned above and may incorporate other methods as deemed necessary.

Oversight Tools

The LWDB will develop written oversight tools that assist the Local Area in conducting a thorough review of programs and activities. The varying requirements of each funding stream involved will be taken into consideration when designing the tools and determining the most effective activities to be used. The tool used for each oversight activity will be included with the final monitoring report. Examples of oversight tools may include, but are not limited to:

- Risk Assessment Tool
- Monitoring Review Guide
- Corrective Action Tracker
- Corrective Action Plan Template
- Monitoring Report Template

Programmatic Monitoring Requirements

In accordance with IWD policy Chapter: 9 Section: 2.2.2 program monitoring may include on-site reviews of policies, plans, and procedures governing all segments of the contracts program activities and operations at least once during the program year. Additionally, monitoring may include reviewing services to participants for program accountability and to ensure subrecipients perform in accordance with the terms, conditions, scope of work, and specifications of their contracts. Participant files may also be reviewed as part of program monitoring to include but is not limited to:

- Participant eligibility and/or priority for the specific program and services;
- Orientation to services;
- Signed acknowledgement from the participant that notification of complaint and grievance rights and procedures were received;
- Justification for the provision of Individualized Career Services or Training services;
- Method of assessment;
- Employment planning;
- Individual Training Accounts;
- Appropriateness and accuracy of participant payments (i.e., supportive services);
- Appropriate data entry and posting of outcomes, including attainment of a degree or certificate and any supplemental employment data; and
- Any other applicable Data Elements.

A random sampling of files from every funding stream will be selected to test eligibility and compliance in every funding stream for which there is a contract with the LWDB. Programs funded by other Grantors will follow the monitoring requirements in the respective scope of work.

The monitoring staff may also review one or more personnel records of individuals paid through contracts with the LWDB. The purpose of this review would be to ascertain if subcontractor staff:

- Possess the education and experience to perform the responsibilities of the position;
- Expend the time on contract related activities charged against the contracts being monitored;
- Have signed complaint and grievance procedures on file.

EEO and ADA Compliance

Monitoring staff may survey the subcontractor's hiring practices, promotion practices, facilities, and outreach and intake procedures to ascertain the sub-recipient's compliance with the Equal Employment Opportunities and the Americans with Disabilities Act.

Monitoring Process

1. The monitor will determine the timeframe for monitoring and sample size and method to be used and will be sent to the sub-recipient in a notification letter.
2. Entrance and exit conferences will be scheduled for onsite monitoring with the subrecipient's leadership staff;
3. The sub-recipient will receive the list of documents to be monitored from the monitor and the monitoring tool.
4. A time frame for submission of documentation by the sub-recipient will be set by the monitor based on the type of monitoring method and noted in the notification letter.
5. The monitor will record any comments, concerns, or recommendations on the monitoring tool. The monitor will also add comments regarding Best Practices found during the review.
6. The monitor will review everything with the sub-recipient and submit the report to the sub-recipient along with any findings and/or recommendations. If there are any findings, the sub-recipient will be required to submit a corrective action plan within 15 business days after the sub-recipient receives the written monitoring report. Corrective Actions must be satisfactorily implemented within 3 months of the finding. If that is not possible, the sub-recipient must submit a request for extension, along with justification, to the LWDB executive director.
7. When the response is received from the sub-recipient, the monitor will produce a written monitoring report for each sub-recipient and submit to the executive director for review.
The report will outline, at a minimum:
 - a. type of monitoring and oversight tools used
 - b. the activities which were monitored;
 - c. the systems which were monitored;
 - d. monitoring findings; and
 - e. if applicable individual participant files which were found to contain errors;
 - f. recommended corrective action, including training and technical assistance
 - g. subcontractor performance
 - h. contract concerns
 - i. best practices
 - j. recommendations
8. The executive director will compile the annual reports of the sub-recipient, which will include performance measures, expenditure and contract performance and the fiscal monitoring reports.
9. The Operations Committee will review program monitoring reports and make recommendations to the Executive Committee if necessary. The Committees will review the monitoring report, the sub-recipient's response and may recommend to the LWDB and CEOs:
 - a. Accept the subcontractor's response
 - b. Reject all or part of the response and/or require resubmission of the response
 - c. Require additional corrective action
10. The LWDB and CLEO, may accept or reject the summary monitoring report, or may request additional information regarding all or part of the report. When the LWDB and CLEO are satisfied that the process has been satisfactorily completed, they will either accept the original, amended or substitute summary report, and move for suspension of monitoring.

NOTE: As this report will be considered a public document, names of participants will not appear in the final report presented to the Board and Committees of the Board.

LWDB Responsibilities in Consultation with Iowa Workforce Development (IWD) The LWDB will submit the annual approved monitoring report and resolutions to IWD for review at the time of issuance. The LWDB will electronically submit new or updated documents, and monitoring reports and resolutions to: iwd.WIOA@iwd.iowa.gov

Process for Addressing Disagreements

Should the sub-recipient disagree with any findings from the monitors they have the right to submit a formal request in writing for a review to the executive director, along with justification and documentation in support of their request. The executive director will provide a written response within 10 business days of the date the request was submitted. If a satisfactory decision cannot be agreed upon the sub-recipient has the right to file a grievance with the Executive Committee. The Executive Committee will perform a review of all party's documentation and ask any clarifying questions and provide the LWDB's final decision on the issue within 20 business days of the sub-recipient's formal request.