

**POLICY**

<b>TITLE:</b>	Monitoring Policy	<b>PROGRAM:</b>	Adult/DLW/Youth
<b>EFFECTIVE DATE:</b>		<b>REVISIONS:</b>	1/01/2017

***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 New River/ Mount Rogers Workforce Development Area.

***Policy***

Through regular oversight and monitoring of WIOA sub-recipients and contractors, the New River/Mount Rogers Workforce Development Area Consortium Board will assess compliance with regulations and policies established by the Workforce Innovation and Opportunity Act (WIOA), Virginia Community College System (VCCS), New River/Mount Rogers Workforce Development Area Consortium Board, as well as compliance with the terms and conditions of contracts between New River/Mount Rogers Workforce Development Area Consortium Board 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 New River/Mount Rogers Workforce Development Area Consortium Board 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 New River/Mount Rogers Workforce Development Area Consortium Board 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 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 by the date established by the Executive Director.

- Verbal 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, 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 New River/Mount Rogers Workforce Development Area Consortium Board staff. Staff may conduct follow up monitoring reviews/visits to ensure that 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 New River/Mount Rogers Workforce Development Area Consortium Board staff to ensure that the performance objectives of Workforce Development 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. New River/Mount Rogers Workforce Development Area Consortium Board 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 New River/Mount Rogers Workforce Development Area Consortium Board with sufficient information to justify a decision to notify the following authorities:

- New River/Mount Rogers Workforce Development Area Consortium Board Chair
- New River/Mount Rogers Workforce Development Board Chair
- Virginia Community College System
- Department of Labor.