

SECTION 12 – INTERNAL MONITORING AND QUALITY ASSURANCE

12.1 Purpose

This section establishes procedures for monitoring, documenting, reviewing, and ensuring compliance in the administration of workforce programs operated or overseen by the New River/Mount Rogers Workforce Development Board.

These procedures ensure:

- Proper documentation of services and employer-based training activities
- Compliance with federal and state regulations
- Verification of employer eligibility and contract compliance
- Proper reimbursement documentation and fiscal oversight
- Internal monitoring and quality assurance
- Protection against unsupported costs or improper payments

Internal monitoring supports strong internal controls and helps ensure compliance with applicable regulations including WIOA, 2 CFR Part 200 (Uniform Guidance), and Virginia Works guidance.

All fiscal execution must comply with the Financial Management and Procedures Manual.

12.2 Employer Eligibility Verification Procedure

Before executing any employer agreement, staff must:

1. Verify employer legitimacy:
 - Active business registration
 - Valid tax identification number
 - Physical business address
2. Verify employer standing:
 - Not debarred or suspended (SAM verification)
 - No known labor law violations that would prohibit participation

3. Document verification:

- SAM screenshot retained
- Employer verification checklist completed
- Conflict-of-interest disclosure reviewed

No agreement may be executed without documentation of eligibility verification.

Where an employer relationship meets the definition of a subrecipient under 2 CFR §200.331, monitoring shall additionally comply with the Subrecipient Monitoring requirements outlined in the Financial Management and Procedures Manual.

12.3 Occupational Skills Training Procedures

When training is provided through a third-party provider:

1. Confirm provider eligibility (ETPL when required).
2. Confirm alignment with participant ISS.
3. Obtain cost documentation.
4. Verify funds availability.
5. Execute training agreement prior to start date.
6. Enter obligation into tracking system.

Required documentation includes:

- Training plan
- Cost breakdown
- Attendance tracking
- Progress verification

Training payments must not be made without documentation of attendance.

12.4 Work Experience Procedures

Before work experience begins:

1. Execute written worksite agreement.
2. Define job duties and supervision plan.
3. Confirm wage rate and schedule.
4. Ensure workers' compensation coverage is documented.

5. Document alignment with ISS.

During work experience:

- Collect signed time sheets after each pay period.
- Document employer contact at least monthly.
- Document skill development progress.

Supervisory monitoring must be documented.

12.5 On-the-Job Training (OJT) Procedures

Prior to OJT start:

1. Conduct employer eligibility verification.
2. Develop training outline with defined skills.
3. Establish training duration and reimbursement rate.
4. Execute OJT contract before start date.
5. Enter obligation into tracking system.

Reimbursement procedures:

1. Employer submits payroll documentation.
2. Staff verify:
 - Wages paid
 - Hours worked
 - Reimbursement percentage compliance
3. Case manager confirms training progress.
4. Supervisor reviews and approves.
5. Fiscal processing occurs per Financial Manual.

No reimbursement may occur without payroll documentation.

12.6 Incumbent Worker Training Procedures

Prior to execution:

1. Confirm employer contribution requirements are met.
2. Document incumbent worker wage levels.

3. Confirm training improves retention or wage progression.
4. Execute written agreement prior to training.

Cost-share documentation must include:

- Employer payroll contribution documentation
- Proof of employer-paid training costs
- Calculation worksheet

Employer contribution must be verified prior to reimbursement.

12.7 Employer Monitoring Standards

Monitoring must include:

- Verification of training delivery
- Confirmation of participant attendance
- Confirmation of wage payments
- Verification of skill acquisition
- Documentation of site visit or employer contact

Minimum monitoring frequency:

- OJT: At least once during the training period
- Work Experience: Monthly
- Incumbent Worker Training: At midpoint or completion

Monitoring must be documented in case notes and retained in the participant or employer file.

12.8 Placement and Employment Verification Procedure

When a participant obtains employment:

1. Collect verification documentation.
2. Confirm employment start date.
3. Confirm wage rate.
4. Document alignment with training.
5. Enter placement into the reporting system.

Wage documentation hierarchy:

1. State wage record (primary source)

2. Employer verification
3. Pay stub
4. Offer letter
5. Supplemental documentation (when allowed)

Self-attestation may only be used when permitted and must include written justification.

12.9 Employer Payment Internal Controls

No single individual may:

- Execute a contract
- Approve reimbursement
- Process payment
- Reconcile payment

Segregation of duties must be maintained consistent with the Financial Management and Procedures Manual.

12.10 Contract Modification and Amendment Procedures

If any material term of a training or employer agreement changes, including but not limited to:

- Wage rate
- Reimbursement percentage
- Training duration
- Maximum reimbursement amount
- Scope of training

A written contract amendment must be executed prior to implementation of the change.

The amendment must:

- Be signed by all required parties
- Be approved by the Program Manager
- Be reviewed for budget availability
- Be reflected in the obligation tracking system

Retroactive amendments are prohibited.

12.11 Red Flags Requiring Escalation

Immediate supervisory review is required if:

- Employer refuses documentation
- Payroll documentation appears altered
- Reimbursement request exceeds contract limits
- Training start date precedes contract execution
- Employer fails to provide monitoring access

Suspected fraud must be reported in accordance with fraud reporting procedures.

12.12 Internal Review and Quality Assurance

Supervisory review shall occur:

- Prior to first reimbursement
- At midpoint of contract
- At completion of the training agreement

Quarterly review of employer agreements must include:

- Active contract list
- Total reimbursement paid
- Remaining obligation
- Compliance with contract terms

Findings must be documented and corrective action implemented when necessary.

12.13 Record Retention

Employer agreements and related documentation must be retained consistent with:

- 2 CFR §200.334
- Grant-specific requirements
- Organizational record retention standards

Records must remain accessible for audit, monitoring, or investigation throughout the retention period.