



TO: The Workforce System

FROM: Regina Ashley, Chief Strategy Officer *RAA*
Indiana Department of Workforce Development

DATE: April 14, 2016

SUBJECT: DWD Policy 2015-06
INTERIM MONITORING POLICY

Purpose

The purpose of this policy is to issue interim guidance regarding state and local level fiscal and programmatic monitoring requirements under the Workforce Innovation and Opportunity Act (WIOA); primarily Title I (Adult, Dislocated Worker, and Youth).

Rescission

DWD Policy 2007-28, State Level and Sub-Recipient Monitoring Policy

References

- Workforce Innovation and Opportunity Act, Sections 116, 184, 185, and 188
- Department of Labor Exceptions at 2 CFR, Part 2900, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Final Rule
- Office of Management and Budget, 2 CFR Chapter I, Chapter II, Part 200, et al, Uniform Administrative Requirements, Cost Principles, and Audit Requirements Final Rule
- WIOA Proposed Regulations, Subpart D, Sections §683.400-683.440, and Subpart G, Sections 683.700-683.750
- Training and Employment Guidance Letter, No. 15-14.

Content

STATE LEVEL MONITORING

Monitoring Scope.

DWD, on behalf of the Governor, is responsible for oversight of the programmatic and financial activities of its grant sub-recipients to ensure proper stewardship of federal WIOA funding. DWD must monitor each program, function, and activity to assure compliance with applicable federal requirements and performance expectations.

DWD's Regulatory Oversight & Compliance (ROC) Division shall conduct on-site monitoring of each Local Workforce Service Area (LWSA) on an annual basis in compliance with the Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the OMB Super Circular) as adopted by the Department of Labor (DOL). The State must certify this monitoring process to DOL every two years.

The ROC Division shall establish and distribute an annual schedule of state level monitoring at the beginning of each Program Year (Initial Schedule). The Initial Schedule, subject to modification, will list Annual On-Site Review (OSR) dates for each LWSA. The ROC Division shall not be limited to the Initial Schedule, and may conduct unannounced or unscheduled reviews at its discretion.

For PY 2015, the ROC Division will monitor the LWSA's WIOA Program Year activities-to-date in three major subject areas (Review Areas):

1. Administrative and Financial Management. This Review Area includes, but is not limited to, an evaluation of the LWSA's Workforce Development Board (WDB) and sub-committees, the WorkOne system, administrative and financial policies and practices, and sub-recipient monitoring and oversight according to applicable federal and state legislation, regulations, policies and guidance, and OMB Circulars and Uniform Guidance. ROC Division staff will conduct this evaluation via document review and sample selection.
2. Workforce Development Programs. This Review Area includes, but is not limited to, an evaluation of the LWSA's programs and services to eligible participants pursuant to WIOA requirements and related federal and state legislation, regulations, policies and guidance, and OMB Circulars and Uniform Guidance. ROC Division staff will utilize random electronic sampling to examine Adult, Dislocated Worker, and Youth participant files for proper maintenance and content, inclusion of pertinent forms and data, appropriate and adequate case notes to ensure continuity from time of application through completion of services, as well as verification that all relevant data has been entered into the case management system.

On-site visits to various WorkOne centers within the region and interviews with regional management, staff, and clientele will be conducted to observe operations and gain insight into the WorkOne environment, processes and procedures, and overall customer service efforts and effects.

3. This Review Area will also include an examination of any additional DWD or core partner administered grants and programs active within the region during the monitoring period. ROC Division staff, during their review, will correspond with applicable grant and program management staff to obtain progress and status updates for inclusion in the LWSA's Comprehensive Monitoring Report.
4. Performance. This Review Area includes, but is not limited to, an examination regarding how the LWSA has performed against applicable performance requirements.

Additional Review / Technical Assistance.

In addition to the Annual OSR, some monitoring activities may be conducted by phone, through desk reviews of documents and reports, and by such other means as deemed necessary by ROC. If a concerning area or practice is identified at any point, the ROC Division may offer or coordinate technical assistance as needed. Details of additional review and any technical assistance provided shall be logged by appropriate ROC Division or DWD Program staff.

LOCAL LEVEL MONITORING

The WDB, in partnership with the chief elected official for the LWSA, must monitor all service providers and sub-recipients on-site, at least annually, or once during each contract term (for contracts lasting less than one year), for financial and programmatic compliance. The WDB must ensure that the use, management, and investment of funds for workforce development activities maximize performance outcomes under WIOA Section 116.

Each LWSA must develop and implement a Local Monitoring Policy addressing their sub-recipient oversight and monitoring process and how the local WDB will be engaged in local monitoring and oversight activities. A copy shall be submitted to ROC Division upon request.

Effective Date

Immediately.

Ending Date

Upon rescission.

Contact for Questions

policy@dwd.in.gov

Action

Each LWSA must review current monitoring policies to determine if changes are needed to comply with WIOA and the OMB Circular and Uniform Guidance.