



NORTH COUNTRY WORKFORCE DEVELOPMENT BOARD
Program Oversight and Monitoring Policy and Procedures
Adopted June 8, 2018

Purpose

To implement a comprehensive system for oversight and monitoring of Workforce Innovation and Opportunity Act (WIOA) activities of sub-recipients and contractors. The purpose of the monitoring is to ensure expenditures meet the programmatic, cost category and cost limitation requirements of WIOA and its regulations. Monitoring is also intended to ensure compliance with the provisions of WIOA regulations and other applicable laws and regulations, and that technical assistance is provided as needed.

Background

Clinton County is the grant recipient and the OneWorkSource Centers in Clinton, Essex, Franklin and Hamilton counties are the sub-recipients, with all funds passing through the NCWDB. Clinton County Employment and Training Administration (CCETA), Adirondack Community Action Program (ACAP), FEH-BOCES and Hamilton County DSS have been selected as one-stop operators in, respectively, Clinton, Essex, Franklin and Hamilton counties by the North Country Workforce Development Board (NCWDB). As OneWorkSource Center operators, these organizations operate WIOA programs and disburse WIOA funds through contracts or Individual Training Accounts (ITAs). In addition to the NCWDB/CLEO agreement, there is a financial contract between Clinton County that outlines the disbursement of funds.

Policy

The NCWDB is responsible for monitoring and oversight of WIOA activities in Clinton, Essex, Franklin and Hamilton counties. This includes financial, program and performance/management. Financial and performance/management monitoring of the OneWorkSource Centers is described in the below sections.

Procedure

A. Fiscal Monitoring:

Fiscal Monitoring of the NCWDB is the responsibility of the NYS DOL FOTA office.

Fiscal Monitoring of the OneWorkSource Centers' will be conducted by the NCWDB Finance Director and will include Financial, Property Management and Procurement procedures as outlined below.

The instruments to be used for sub-recipient monitoring is the review guides attached to Technical Advisory #4-19. These review guides provide methodology for generating written reports regarding findings and corrective actions, so this information will not be restated here. Monitoring reports will be issued to the sub-recipient within thirty (30) days of the completion of an on-site visit. Sub-recipient will be given ninety (90) days to respond and submit a corrective action plan. Follow-up on the corrective action plan will take place within sixty (60) days of the receipt of the corrective action plan. Correspondence and visits will continue at appropriate intervals (no more than thirty (30) days) until findings are resolved.

NYSDOL will be notified as soon as possible after the discovery of significant issues while a review is in progress. The monitor will proceed with the review as planned, modified only by any requests NYS DOL may have due to the issues presented. In notifying NYSDOL of significant issues discovered in the review, the NCWDB Finance Director and the operator(s) will be copied on the notification letter.

An original monitoring report will be sent to the operator(s). After a monitoring review is completed, the working papers, monitoring report, operator responses and correspondence between from the operator(s) will be retained for ten (10) years.

Technical assistance will be provided to operator(s) as soon as possible after receiving a written or verbal request from the operator(s). NYSDOL will be contacted if that technical assistance requires help from them. The assistance will be provided in whatever format is necessary for the best possible outcome for the operator(s) with a written follow-up.

If monitoring reveals that a single line audit was not conducted for a recently closed fiscal year, the NCWDB Financial Director will issue a letter to the operator(s) stating their payments will be held until such time a copy of the operator(s) completed single line audit report for that given fiscal year is received.

B. Program Monitoring:

Program Monitoring of the NCWDB is the responsibility of the NYS DOL Program office.

Program Monitoring of the OneWorkSource Centers' will be conducted by the NCWDB Program Director as outlined below.

All components of WIOA activities will be annually monitored. Each year, a representative sample of the participants enrolled in each category (youth, adult, dislocated worker) will be drawn for folder monitoring. Results from the program monitoring will be shared, and discussed, with the OneWorkSource Center Operators. If necessary, significant findings will be reported to NYSDOL.

Topics to be reviewed:

- Eligibility and records review

- Delivery of services
- Quality of services
- EEO requirements/grievance procedures
- Appropriateness of training services according to the training plan

Records will be maintained by the NCWDB Program Director pertaining to monitoring and be made available for review by State and Federal officials.

C. Performance and Management monitoring:

Operators, in partnership with the NCWDB, monitor management and performance issues on a consistent basis. The NCWDB Program Director will continue to monitor performance, address issues, and develop corrective action plans as the need arises. Any issues or corrective actions will be reported and discussed in regularly scheduled operator meetings. If necessary, significant issues will be reported to NYS DOL.

The issues to be monitored include:

- Legislated performance standards
- Costs efficiencies
- Data validation issues
- Registrants v. exits
- Trends and continuous improvement issues
- Customer flow through the system issues
- Training related issues
- Business services related issues

Records will be maintained by the NCWDB Program Director pertaining to monitoring and be made available for review by State and Federal officials.

Schedule

Monitoring of both fiscal and programmatic functions will be conducted annually per fiscal or program year respectively and at dates determined and mutually agreed upon by the operators.

Monitoring of performance and management functions occurs continuously and is reported at regularly scheduled operator meetings.