

Policy No. 05.02

Monitoring

Issue Date: June 1, 2006

Expiration: Until Rescinded

Last Update: November 2025

Purpose

The Indiana Department of Workforce Development has issued policy guidance regarding monitoring for Workforce Innovation and Opportunity Act (WIOA) sub-recipients. The purpose of this policy is to communicate Federal and State regulations regarding the monitoring process through appropriate local levels for all WIOA sub-recipients. Additionally, this policy has incorporated local guidance, where appropriate for standardized implementation.

References

- DWD Policy 2024-07, Change 1: State and Local Subrecipient Monitoring Requirements
- WIOA Sections 116, 183, 184
- 20 CFR 683.410

Background

The Chief Elected Official is the grant recipient of the Workforce Innovation and Opportunity Act (Title I) funds for Region 10. Southern Indiana Works is required to comply with and enforce Federal Regulations and DWD policies for the Workforce Service System.

Content

The Southern Indiana Works Chief Elected Official is the grant recipient of WIOA (Title I) funding on behalf of Southern Indiana Works. Southern Indiana Works is responsible for oversight of WIOA-funded services and programs. The Southern Indiana Works Board of Directors (Board) is obligated to provide oversight activities and perform monitoring functions for the administration of such funds granted by the Indiana Department of Workforce Development. This oversight responsibility includes reviewing, monitoring and evaluation.

Specifically, the Southern Indiana Works Service Area oversight responsibilities include:

1. Compliance with applicable state and federal laws and regulations and monitoring priority areas such as procurement, fiscal, and programmatic practices.
2. Ensuring expenditures have been made against cost categories and within cost limitations specified in WIOA and corresponding regulations.
3. Evaluating contractor performance.
4. Providing technical assistance as necessary and appropriate.

Identification and Scope of Monitoring

Subrecipients of WIOA Title I funding will be subject to oversight and monitoring of all program/contract requirements. This will include a programmatic overview and file monitoring to determine compliance with federal, state and local policies. If a service provider receives multiple findings in the internal and/or agency monitoring process, the Board will conduct a follow-up monitoring process within three months.

The Board will conduct programmatic monitoring to ensure compliance with WIOA federal, state and local regulations and other laws, and provide technical assistance where appropriate. Program monitoring will be conducted once each program year, or at least once during the term of the contract.

The Fiscal Agent will be responsible for financial monitoring activities, which will also occur once each year.

NOTE: Southern Indiana Works does not permit any program or administrative files or file documents to be removed from the premises of the WIOA Program Administrative Office for review, monitoring or audit of any program. All reviews or monitoring must be conducted on-site, without exception, with staff present on-site to assist as appropriate.

Monitoring Guide

Initial monitoring will be conducted using the guidelines of the contract between the Board and the service provider, utilizing the statement of work as provided by the service provider and incorporated into the contract. The service provider will be held accountable to the terms and conditions within the contract, including all program modifications.

A monitoring guide may be developed as an oversight tool used to gain a better understanding of the subcontractor's project processes. If a monitoring guide is developed, it will be shared with the service provider within 48 hours of the scheduled on-site monitoring. The monitoring guide may be subject to change corresponding with legislative or policy modifications from the federal, state or local level. When available, monitoring materials developed by Indiana Workforce Development's Oversight Unit may be utilized in the monitoring process.

Monitoring of High-Risk Service Providers

A determination may be made that the service provider exhibits high risk where:

- Monitoring activities exhibit significant findings or findings are deemed repetitive in nature
- Monitoring activities exhibit findings that result in disallowed costs exceeding \$5,000
- Service provider fails to obtain a minimum number of WIOA performance measures, based on contract expectations
- Negative public relations and/or published scandals that have come to the attention of the board may negatively impact program or contract performance
- Recommendation by the Indiana Department of Workforce Development or U.S. Dept. of Labor.

If the Board determines through the internal and/or agency monitoring process that the service provider exhibits high risk due to significant findings in any review process, and/or failure to follow compliance procedures, a follow-up monitoring review will be conducted within three months of the monitoring

report. If the service provider fails to improve and continues to exhibit deficiencies in the follow-up review, then the provider will be notified of probationary status and will be monitored monthly or quarterly thereafter for a term not to exceed six months. Service providers who do not exhibit significant improvement may be recommended for cancellation.

Monitoring Reports

As a result of the analysis of the data gathered from the monitoring process, a Monitoring Report will be generated. Generally the Monitoring Report will contain:

- a. A review of the monitoring objectives;
- b. A brief description, including dates, of the monitoring activities and a listing of the data sources;
- c. Identification of any significant findings, either positive or negative;
- d. Conclusions identified, noting how the analysis of data led to such conclusions;
- e. Recommendations including any corrective actions, which may be necessary.

Corrective actions are noted whenever it is determined that the contractor has deficiencies or problems. The Monitoring Report's recommendations for corrective action will identify what action is necessary/required and the schedule/timeframes for implementation. Additionally, the report may indicate a follow-up monitoring activity as well as any recommendations concerning future contracting.

Report Formats/Time Frames

A preliminary Monitoring Report will be provided upon completion of the annual monitoring activity/process. Monitoring staff will prepare a written report and may provide an on-site conference and offer Technical Assistance if necessary. Service providers will have a specified period of time to provide any clarifications or information which could alter or amend the conclusions and recommendations of the preliminary report. The monitoring entity will review these clarifications and issue a final Monitoring Report to the Board upon receipt of such clarifications from service providers.

Documentation of Findings Procedure

Participant files are reviewed to ensure that appropriate documentation, as mandated by the Federal and State regulations, is adequately noted in the file as it relates to eligibility, provision of services, and supportive and training expenditures. Monitoring of OJT contracts and follow-up with OJT participants must be documented in service records.

When a finding is noted, it is the responsibility of the service provider to supply the monitoring entity with appropriate documentation to resolve the finding. Eligibility guidelines have been provided as local policy that defines the documentation required. Questions regarding local policy, or for clarification, should be addressed to the Board contact on the policy.

Resolution Procedures/Time Frame

The service provider will be provided with the opportunity to respond to all compliance/finding, observation issues, and questioned costs within 30 days from the date the report was issued. Responses should be submitted in narrative format, with a description of each issue being addressed, and its proposed resolution. Supporting documentation to correct the compliance/finding must be included with the narrative response.

The monitoring entity will review the submission and attached documentation and will issue a response to resolution, identify additional actions to be taken, or both. A resolution means that an issue has met the satisfaction of the monitoring entity on behalf of the Board and is no longer in question or determined out of compliance. Where additional actions are required, the issue in question has not met the requirements of the monitoring entity/Board and remains questioned or deemed out of compliance.

Indiana State Department of Workforce Development Monitoring

The Indiana Department of Workforce Development will monitor the program and fiscal activities of the Local Workforce Development Area in accordance with their calendar schedule provided each year. All results of Southern Indiana Works' own monitoring of subrecipients will be provided to the DWD team at the time of monitoring.

Department of Labor Monitoring

It is always to be anticipated that DOL may monitor during the program year. However, a schedule of this monitoring activity is not available.

Action

Workforce Innovation and Opportunity Act Title I Program Providers and all other appropriate Southern Indiana Works staff must adhere to the policies outlined herein, effective immediately.

Questions regarding the content of this publication should be directed to info@soinworks.com

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