

# **Attachment 9**



[www.job4you.org](http://www.job4you.org)

760 S. Kingshighway, Suite C  
Relay 711  
Cape Girardeau, MO 63703

Phone: 573.334.0990,

Fax: 573.334.0335

### **Sub-State Compliance and Monitoring Policy**

1. **Responsible Representative** - Oversight function is performed by members of the Southeast Workforce Development Board (WDB) staff, programmatic and fiscal. WDB staff work at the direction of the WDB President, and the board itself, to verify that the Workforce Innovation and Opportunity Act (WIOA) regulations are being upheld and the sub-contractors/sub-contracted staff are performing according to proposals submitted and contracts signed. The WDB has charged WDB staff to conduct monitoring as staff members are not authorized to operate programs. Monitoring includes but is not limited to fiscal expenditures, WIOA program eligibility and compliance, NGCC compliance, and data system compliance.
2. **Accountability** - WIOA mandates the local WDB and the CEO are responsible, in partnership, for the oversight of the WIOA Title-I programs. In order to fulfill this oversight responsibility, the results of the annual sub-state monitoring are submitted to the President/COO, Chief Local Elected Official (CLEO), and members of the Youth Action Network Committee. This submitted report includes all comments, concerns, and/or disallowed costs that were discovered during the sub-state monitoring regardless of corrections that have been submitted and approved.
3. **Compliance and Performance** - The Division of Workforce Development (DWD) requires an annual monitoring report presented to the CEO and board members regarding compliance and performance reviews. To fulfill this annual requirement the WDB Compliance staff present a Sub-State Monitoring Report to the full board and subcontractor attendees during the quarterly board meeting following the completion of the Sub-State Monitoring. This annual report includes Sub-State Monitoring results, compliance concerns, performance reviews, adequacy of assessments, planning of activities and services, coordination with One-Stop Delivery System partners, and customer outcomes. If a problem is discovered during Sub-State or any other on-going monitoring, the WDB adheres to the WIOA regulations and requires that these problems be resolved by prompt and appropriate corrective action.
4. **Compatibility** – Once each program year, to ensure there is a file for every data system entry, WIOA participant files are counted before the annual Sub-State Monitoring. The Southeast WDB utilizes monitoring documents to evaluate program compliance issues. These documents are updated annually to reflect current WIOA regulations, directives as issued by the Division of Workforce Development, or as requested by the WDB, President/COO, or CLEO. The WDB adheres to all Federal Equal Opportunity regulations, and WDB staff monitors the sub-contractor for compliance with WIOA, NGCC, State & Federal Guidelines, and Equal Opportunity laws.
5. **Quality Assurance** - The Southeast WDB reviews program quality and provides for continuous improvement of service delivery. When the sub-state monitoring has been completed an official letter is sent to the sub-contractor by the President/COO of the WDB. This letter identifies the results of the sub-

state monitoring, concerns identified, any compliance issues from prior reviews; if there were previous compliance issues found sub-state monitoring ensures they no longer a concern (federal, state, and/or local). WDB staff performs regular visits of each sub-contractor/Job Center to ensure that services and partner referrals are made available to all participants.

6. **Methodology and Target Universes** – WDB compliance staff will monitor a percentage of new WIOA enrollments per program (funding source-Adult, Dislocated Worker, Youth) for each contract year depending on the size deemed appropriate by the state and WDB President/COO. To ensure compliance in every funding stream for which the Southeast WDB has a contract with DWD, monitoring will include a statistically valid sample of participants enrolled in each of the following services: Classroom Training, On-The Job Training, Work Experience/Internship/Apprenticeship, Supportive Services, or any other services that result in a direct payment being made to, or on behalf of, a participant. If 100% of the files are not monitored, a random sampling technique will be used to identify the selection of files to be monitored.
7. **Compliance Monitoring Review** - At a minimum, these participant files will be reviewed for WIOA eligibility and documentation, priority of services, orientation to services, complaint and grievance procedures, need for services beyond career only, assessments provided, employment planning, training plans, On-the-Job Training contracts, supportive services and the appropriateness of participant payments, appropriate data entry, outcome attainment, supplemental data, 5% over income exception, and the 5% In-School Youth "needs additional assistance" barrier. All forms for eligibility documentation, services rendered, and payments are compared to data system for data entry accuracy.
8. **Financial Monitoring Review** - WDB fiscal staff monitors contracts through the normal course of spot checking and when conducting their fiscal audit each program year. Fiscal monitoring will occur on-site or through desk-top review once each fiscal year. Monitoring consists of accounting standards based upon but not limited to applicable federal and state requirements. WDB fiscal staff monitors on a monthly basis to ensure youth expenditures are in line with WIOA regulations (75% Out-Of-School Youth, 20% Work Based Learning, etc.) No payments are made to sub-contractors until all eligibility documentation, length and payment of participant training, participant employment plans, participant activities, and data system entries have been verified.
9. **Additional Financial and Programmatic Monitoring** – To ensure funds intended to support stand-alone summer youth programs, special initiatives, and grants are administered in accordance with the contracts and scope of work, WDB staff will monitor appropriation programs during program operation. This will be in addition to existing monitoring duties to ensure program compliance, accountability, and transparency of expenditures.