

	
Section 1000	Monitoring Policy for Adult, Dislocated Worker, Youth and One-Stop Operator

1001 BACKGROUND

This section establishes Coconino County Local Workforce Development Board (LWDB) policy regarding the oversight responsibilities as outlined in the following:

- Section 183 of the Workforce Innovation and Opportunity Act (WIOA);
- Code of Federal Regulations (20 CFR 683.410);
- Workforce Arizona Council Policy #07 ARIZONA@WORK WIOA Statewide Monitoring Policy;
- Terms and conditions in any Intergovernmental Agreement or contract entered into on behalf of the Local Workforce Development Area (LWDA) for ARIZONA@WORK Coconino County Adult, Dislocated Worker, Youth Program activities as well as the One -Stop Operator.

This policy will to ensure that:

- A. Adult, Dislocated Worker and Youth Programs and services are operated in compliance with WIOA and applicable Federal, State rules and regulations and ARIZONA@WORK Coconino County Policies and Procedures;
- B. Services and training are being provided to participants as described in the agreement document
- C. The appropriate verification of eligibility or enrollment of participants is on file.
- D. Effective equal employment opportunity guidelines are used in program design and operation;
- E. Tangible outcomes are accomplished at costs which are in line with original proposed costs;
- F. Fiscal integrity is insured, and auditable records are maintained;
- G. Eligible training providers conform to federal, state and local policies; and
- H. The One-Stop Operator is fulfilling its contractual obligations.

	
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NOTE: This policy may be revised based upon policies in development by the Arizona Department of Economic Security and the Workforce Arizona Council

1002 AUTHORITY

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128)
- Code of Federal Register 20 Part 683.410
- Code of Federal Register (Uniform Guidance) 2 Part 200
- Training and Employment Guidance Letter No. 19-16
- Training and Employment Guidance Letter No. 21-16
- Training and Employment Guidance Letter No. 10-16
- Workforce Arizona Council Policy #07 ARIZONA@WORK WIOA Statewide Monitoring Policy

1003 SUBRECIPIENT DETERMINATION

Per Uniform Guidance, 200.330 “subrecipient” means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program. Characteristics which support the classification of an entity as a subrecipient include when the entity:

- A. Determines who is eligible to receive what Federal assistance;
- B. Has its performance measured in relation to whether objectives of a federal program were met;
- C. Has responsibility for programmatic decision making;
- D. Has responsibility for adherence to applicable federal program requirements specified in the award; and
- E. In accordance with its agreement, uses the federal funds to carry out a program for a public purpose specified in authorizing statute.

1004 SCHEDULING OF ANNUAL MONITORING REVIEW

Monitoring will be conducted by LWDB staff, under the guidance of the LWDB.

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- A. No sooner than 30 days prior to an onsite monitoring review, the LWDB will send in writing, notification to the subrecipient notifying them of the annual monitoring. The notification will include the following information:
1. Purpose of the monitoring
 2. Timeframe of the selected information to be monitored
 3. Information to be monitored
 4. Location of the monitoring
 5. Proposed dates of the monitoring review
 6. Request to confirm proposed dates of the monitoring review.
- B. No sooner than three (3) working days prior to the commencement of the agreed upon on site monitoring review, the LWDB will notify the subrecipient of the program participant files selected for review.

1005 MONITORING FREQUENCY

The following shall be monitored on site at least once each program year:

- A. Adult Program
- B. Dislocated Worker Program
- C. Youth Program
- D. One-Stop Operator

1006 CONDUCTING MONITORING REVIEWS

- A. Adult, Dislocated Worker, Youth Programs
For monitoring of client files, the sample size will be a minimum of 10 percent of clients served during the most recently completed program year. If a subrecipient’s administrative office/fiscal department is separately located at an inaccessible site or not within a reasonable commute of the LWDB’s central office, as defined by a 50-mile, one-way drive or greater, LWDB staff will require that copies of all requested records, files or other

	
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documents of a sufficient nature and sample size be delivered to a location identified by LWDB staff for review.

This does not preclude a site visit to a subrecipient’s administrative offices, if warranted.

Monitoring reviews may be a combination of the following:

1. Desk reviews utilizing access to participant and operational records as recorded in the state case management and reporting system;
2. On-site case file reviews
3. Participant and staff interviews
 - a. Desk Reviews

Through a given program year, LWDB staff may randomly choose participant records stored by the State case management and subrecipients for review. Such reviews will consist of assessing the following:

 - i. Thoroughness of information entered into the files;
 - ii. Detailed case notes;
 - iii. Documents uploaded into the system and/or in case files;
 - iv. Data reports pertaining to program activity; and
 - v. Performance of program outcomes.
 - b. On-site Review

On-site reviews will utilize standard monitoring instruments developed by the Arizona Department of Economic Security (DES) or LWDB based upon requirements in the agreement(s) covering the following areas, as applicable:

 - i. Agency administration;
 - ii. Program performance;
 - iii. MIS documents;
 - iv. Participant files;
 - v. Training services;
 - vi. Equal Employment and Nondiscrimination; and
 - vii. Worksite/internship/externship monitoring.

	
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- c. Participant and staff interviews

During the scheduled on-site review, the LWDB may request the scheduling of interviews with selected program participants. These interviews may consist of but not be limited to the following topics:

 - i. Professionalism of staff serving the participant;
 - ii. Knowledge of program staff in providing career guidance;
 - iii. Expectations of program versus actual services provided; and
 - iv. Overall satisfaction of program experience.

B. One Stop Operator

- 1. The One-Stop Operator will be subject to an annual review by the LWDB utilizing the contracted Statement of Work as the basis for such review.
- 2. The One-Stop Operator will also be held accountable for the metrics agreed to by the LWDB.
- 3. The LWDB will develop monitoring tools to be used for this purpose.

1007 MONITORING REPORT

- A. Within 30 days of the initial monitoring completion, the LWDB will transmit a draft report of findings, observations and required actions, to the subrecipient or training provider. The report will include the following information:
 - 1. Name of subrecipient/training provider;
 - 2. Agreement number(s) or other reference if applicable;
 - 3. Findings, Observations, Recommendations and Required Actions;
 - 4. Time frames for corrective actions; and
 - 5. Due date for response.
- B. A monitoring file will be maintained for each subrecipient/training provider, which will contain monitoring reports and follow-up documents, as well as the worksheets, questionnaires, and other back-up information used in the monitoring. Records will be retained per the State WIOA Title I-B Record Retention policy.

	
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1008 STEPS TO CLOSURE

- A. Subrecipients with open findings identified in the Monitoring Report (see Section 1007) will have 30 calendar days after receipt of the report to address the findings in writing and present a corrective plan addressing the required actions outlined in the Monitoring Report utilizing the “Monitoring Review Corrective Action Plan” form (**Exhibit A**).
- B. The subrecipient will submit updated action to the LWDB on a monthly basis until all items are completed and accepted by the LWDB.
- C. Upon acceptance of the corrective action plan from the subrecipient, the LWDB will issue a final close-out report within 30 calendar days.
- D. Failure of the subrecipient to address all outstanding items identified in the Monitoring Review Corrective Action Plan within the agreed upon timeframes, could result in further recommended action as determined by the LWDB up to and including termination of the subrecipient agreement.

1009 TRAINING PROVIDER/CONTRACTOR MONTIORING REVIEW

- A. A training contractor as defined in 2 CFR 200.330 is any organization with whom the LWDB or subrecipient contracts or partners with to provide specific outlined training, classroom or workplace, including training providers and approved by the LWDB Eligible Training Provider List and subrecipient initiated On-the-Job Training Contracts (OJT) and work experience agreements.

A contract is for the purpose of obtaining goods and services for the subrecipient’s use and creates a procurement relationship with the contractor.

Characteristics indicative of such a relationship are when the contractor:

1. Provides the goods and services within normal business operations;
2. Provides similar goods or services to many different purchasers;
3. Normally operates in a competitive environment;
4. Provides good or services that are ancillary to the operation of the WIOA Title I-B program; and
5. Is not subject to compliance requirements of WIOA as a result of the agreement, though similar requirements may apply for other reasons such as the WIOA monitoring requirement.

	
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1010 ELIGIBLE TRAINING PROVIDER MONITORING REVIEWS

- A. The LWDB through its designated representative, will conduct monitoring reviews of the training providers approved on the ARIZONA@WORK Coconino County Eligible Training Provider List (ETPL - <https://www.azjobconnection.gov/ada/r/training>).
- B. The LWDB will conduct eligible training provider monitoring in accordance with State issued policy as posted in the Arizona Department of Economic Security WIOA Policy and Procedure Manual Section 612 [MONITORING OF TRAINING PROVIDERS](#).

1011 TRAINING CONTRACTORS

- A. Subrecipients will be held accountable for the contracting and monitoring of such contracts of training contractors as defined in Section 1009 of this policy. Monitoring of training contractors may take place in the form of desk reviews and/or on-site reviews.
- B. Subrecipients will ensure that the contractor is in compliance with the terms, conditions, and specifications of their contract. The LWDB reserves the right to also perform on-site monitoring when warranted.

1. Desk Review

A desk review may include:

- a. Compliance with the terms, conditions and specifications of the agreement;
- b. Invoices;
- c. Client progress reports;
- d. Participant surveys;
- e. Certificates;
- f. Summary of participant performance data; and
- g. Career Planner feedback.

2. On-site Review

On-site reviews may utilize standard monitoring instruments covering the following, as applicable:

- a. Agency administration;
- b. Program management;
- c. Fiscal management;
- d. Participant files;

	
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- e. Classroom training;
- f. Participant interviews;
- g. Equal Employment and Nondiscrimination; and
- h. Worksite/internship/externship monitoring.

1012 CONFIDENTIALITY, DATA AND RETENTION

- A. All LWDB staff and subrecipient staff participating in monitoring activities will protect the confidentiality of all personally identifiable information (PII) contained in the client files. This includes any third-party monitoring such as Single Audits conducted on behalf of the LWDA or subrecipient.
- B. All requisite Data Sharing Agreements must be in place and current at the time of any monitoring review.
- C. All written reports and other documentation pertaining to monitoring and other oversight activities will be made available for review by the LWDB, Federal, State and County officials.
- D. Reports and other records of monitoring activities must be retained for three years from the date of submission of the final expenditure reports regarding the funding sources monitored. If any litigation, claim, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion and resolution of all such actions or until the end of the three year period, whichever is later.

NAME OF PROVIDER:	PROGRAM NAME:
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**THIS REPORT MUST BE UPDATED AND SUBMITTED WEEKLY TO THE
COCONINO COUNTY WDB UNTIL FINDING(S)/OBSERVATION(S) ARE CLOSED.
EMAIL REPORT TO: workforcedevelopment@coconino.az.gov**

ACTION STEPS TO BE IMPLEMENTED TO ADDRESS F/O	NAME OF RESPONDER	START DATE	TARGET COMPLETION DATE

IDENTIFY FINDING/OBSERVATION #1:			
DOCUMENT ACTION STEPS WITH [DATE] AND [STEP] IMPLEMENTED ON WEEKLY BASIS UNTIL PLAN IS COMPLETE.			

IDENTIFY FINDING/OBSERVATION #2:			
DOCUMENT ACTION STEPS WITH [DATE] AND [STEP] IMPLEMENTED ON WEEKLY BASIS UNTIL PLAN IS COMPLETE.			

IDENTIFY FINDING/OBSERVATION #3:			
DOCUMENT ACTION STEPS WITH [DATE] AND [STEP] IMPLEMENTED ON WEEKLY BASIS UNTIL PLAN IS COMPLETE.			

IDENTIFY FINDING/OBSERVATION #4:			
DOCUMENT ACTION STEPS WITH [DATE] AND [STEP] IMPLEMENTED ON WEEKLY BASIS UNTIL PLAN IS COMPLETE.			