



**MID-CAROLINA
WORKFORCE & TALENT
DEVELOPMENT**

Policy Letter #7

TO: All Staff

FROM: Justin Hembree, Interim Director

SUBJECT: Monitoring Policy

Background

The Mid-Carolina Workforce Services has established an internal program management procedure for monitoring. This Monitoring Policy outlines the-procedures for reviewing Workforce Innovation and Opportunity Act (WIOA) activities, identifying problems, recommending solutions, and initiating actions to achieve program objectives. The responsibility for monitoring will be that of the Mid-Carolina Workforce fiscal and programmatic staff, with oversight from the Director.

Policy

WIOA activities and services, as well as program administration, management practices, and cost-effectiveness supported with WIOA funding, will periodically be monitored/evaluated. This is to ensure compliance with WIOA, DOL regulations, DWS policy issuances, and the terms of any approved contracts/agreements using NC Works. Performance will be monitored monthly to include on-site visits. The state's monitoring guide will be used as a framework for all monitoring activities.

Internal Monitoring:

Internal monitoring will be conducted by the Mid-Carolina Workforce Program Analysts, in conjunction with the Accountant and Service Providers. All reports will be forwarded to the Service Provider's Program Manager, Quality Control Officer, Mid-Carolina Workforce Development Program Coordinator, and Mid-Carolina Workforce Development Director.

The Internal Monitoring will be conducted in the following phases:

Sampling Review:

Random selection of WIOA participant records will be selected and used to review compliance with Local, State, and Federal Guidance. The review may include a small percentage of records which will be conducted on a monthly basis. This will include a review of the requirements under the Workforce Innovation and Opportunity Act (WIOA) guidelines and may include, in part or whole, a review of all pertinent files, contracts, reports, records, etc.

Items of Concerns:

During the Sampling Review files and/or items found with concerns will be issued to the Service Provider's Programmatic Manager for corrections. These concerns will be used to identify areas for improvement related to training.

Corrective Measures:

The Programmatic Manager will receive a report that includes findings, areas of concerns, and recommendations with a deadline for response and any applicable corrective measures. The timeframe for response and applicable corrections are within ten (10) working days from receipt of the issued Items of Concerns on the Sampling Report.

Non-Compliant Actions:

The Program Analyst will notify the Mid-Carolina Workforce Director and all involved parties within five (5) working days after the required response due date of any non-compliant action with regard to corrective measures.

File Audit:

The Program Analyst will conduct a File Audit (Desk Review) of the files that were identified as concerns during the sampling review. The Program Analyst will provide a report that includes findings, areas of concern, and recommendations with a deadline for response and any applicable corrective measures. The Program Analysts will provide a formal report to the Service Provider's Program Manager, Quality Control Officer, Mid-Carolina Workforce Development Program Coordinator, and Mid-Carolina Workforce Development Director regarding the concerns:

Programmatic Monitoring may include but is not limited to, review of:

1. Eligibility determination and verification, to include proper funding and program determination.
2. All documents and agreements are properly signed and dated by all applicable parties and uploaded (scanned/labeled/linked) appropriately in NC Works.
3. Proper redaction of all documents uploaded (scanned) in NC Works.
4. The Objective Assessment (OA), Individual Employment Plan (IEP) / Individual Service Strategy (ISS), and the WIOA application are completed, signed, scanned, and linked appropriately in NC Works to include the EEO section
5. Applicable services, related case notes, verification documents, self-attestations, and service codes are compliant within NC Works
6. Contract compliance – review of all contracts (e.g. Work Experience (WEX), On-the-Job Training (OJT), Incumbent Worker Training (IWT), National Dislocated Worker Programs, and all Special Grants.
7. All timesheets, attendance records and mileage reimbursement, ITA and supportive services vouchers, etc., including supporting applicable documentation are correctly completed, calculated, signed, dated, and scanned in NC Works, with case notes.

8. Worksite Review of all Work Base Learning (OJT – WEX – IWT) job sites
9. Credential Attainments and Follow-ups are documented appropriately in NC Works (case notes).
10. Local Area Policy is in compliance with all Local, Federal, and State Guidance.

State Monitoring

The State Monitoring Officer will report all findings and make recommendations to the Mid-Carolina Director to ensure that compliance and any corrective action are taken immediately and appropriately. Following is a brief description of the monitoring steps:

1. **Notification of Program Operator:**

The program operator may be notified in writing or by telephone. This notification includes the subject areas to be monitored, time frames involved, and site(s) to be visited. Notification is made 5–7 days in advance and/or maybe conducted virtually.

2. **Desk Review:**

A desk review will be conducted prior to the visit. This includes a review of the requirements under WIOA. A review of all pertinent files, contracts, reports, records, etc. will be reviewed prior to the monitoring visit.

3. **Entrance Interview:**

An entrance interview will be conducted and staff introduced. The objectives of the monitoring visit are explained at this point.

4. **Programmatic Review:**

This section of the monitoring visit will include a review of the following sections:

- Review of the contracts
- Equal opportunity and complaint procedures
- Review of applicant and participant data
- Enrollments, training, attainment of degree or credential, job placements, wage gains, and job retention, on a monthly basis.
- MIS and records
- Eligibility determination and verification
- Assessment and counseling procedures
- Individual Service Strategy
- Transitional Jobs
- On-the-Job training contracts
- The proportion of funds spent on Out-of-School and In-School Youth for the WIOA Youth Program

5. **Fiscal Monitoring:**

This is conducted to ensure an adequate system of financial record keeping, documentation of problems, and recommendations for corrective action. This section of a monitoring visit will include, but is not limited to, the following:

- Financial and Administrative Systems
- Accounting and Fiscal Management
- Budget
- Payments and Disbursements
- Internal Controls
- Contractor/Subcontractor Controls
- Financial Reporting
- Program Income
- Procurement
- Audits

6. **Exit Meeting:**

An exit meeting will be conducted at the completion of the monitoring visit. The monitoring officer will review tentative findings and recommendations.

7. **Written Report:**

This is prepared for the Mid-Carolina Director. However, if a serious problem is discovered, the Mid-Carolina Director is notified immediately of such activities.

8. **Follow-Up:**

- Monitoring Officer prepares a report and forwards it to the Mid-Carolina Director.
- Mid-Carolina Director assigns appropriate corrective actions.
- The training provider or agency is required to implement corrective actions and provide a written report to the Mid-Carolina Director.
- Mid-Carolina Director forwards the actions taken back to the Monitoring Officer.
- Monitoring Officer then files the report and schedules a follow-up visit to ensure compliance with the corrective actions.

Creation Date

July 2022