

Section-05 Compliance	P-0500200	Effective Date: 04/15/2021
Replaces TAWDB P-0500200 dated 06/18/2020 and EWDB Monitoring Policy and Procedure revised 2016		
Delaney Rea, GCWDB Chair		

Monitoring Policy

It is the policy and commitment of the Green Country Workforce Development Board (GCWDB) that our programming be compliant with federal, state, and local area policy while ensuring robust programming for the clients we serve and creating outcomes that change the trajectory of a person's life and increase the economic prosperity of the communities we serve. Additional guidance may be found in OWDI 11-2017, Change 1 entitled "Governor's Oversight and Monitoring Plan" dated May 20, 2020.

GCWDB and the designated fiscal agent are responsible for overseeing and monitoring their WIOA and other federal grant-funded activities and those of their subrecipients in order to:

- A. Determine that expenditures have been made against the cost categories and within the cost limitations specified in the Act and the regulations in this part
- B. Determine whether or not there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws, regulations, and contracts
- C. Provide technical assistance as necessary and appropriate

I. Monitoring: GCWDB is committed to a policy of monitoring that is not only focused on the review process to identify weaknesses and areas of non-compliance, but also to provide an opportunity for technical assistance and training, identify best practices, implementing corrective action, and ensuring corrective action is completed. Staff designated by the GCWDB shall conduct regular and periodic monitoring to determine compliance with federal regulations, state policies, and GCWDB policies as well as procedures. Monitoring activities shall be conducted with such frequency and in such detail, both quantitative and qualitative, to provide reasonable assurance of compliance and effective program operations. Monitoring activities shall include, but are not limited to:

- A. Administrative and Financial Activities
- B. Customer File Reviews
- C. Data Validation
- D. Performance Evaluation

II. Monitoring Schedule: Reports will be generated from regular monitoring data to present a timely, accurate and appropriate vehicle for staff reporting of program and overall operations efficiencies/deficiencies.

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Auxiliary aids and services are available upon request to individuals with disabilities.

Section-05 Compliance	P-0500200	Effective Date: 04/15/2021
Replaces TAWDB P-0500200 dated 06/18/2020 and EWDB Monitoring Policy and Procedure revised 2016		
Delaney Rea, GCWDB Chair		

- A. Client files will be reviewed on an ongoing basis.
- B. Performance measures will be reviewed on a continual basis.
- C. All other areas will be reviewed once a program year

III. Components of Monitoring:

- A. Compliance may include a review of:
 - 1. Eligibility determination
 - 2. Needs determination
 - 3. Progression towards performance achievement
 - 4. Other areas of service provision
 - 5. Administrative controls
 - 6. Civil rights & ADA compliance
 - 7. Review of participant records for assessment and employability plan
 - 8. Review of uploaded documents
 - 9. Compliance with established local policies
 - 10. Contract performance compliance

- B. Fiscal may include a review of:
 - 1. Review of the payment determination process
 - 2. Source documentation
 - 3. Traceability for all transactions
 - 4. Match and leveraged resources
 - 5. Budget control
 - 6. Cash management
 - 7. Program income
 - 8. Cost allocation
 - 9. Allowable costs
 - 10. Financial reporting
 - 11. Training resource management
 - 12. Procurement
 - 13. Equipment
 - 14. Intangible property

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Auxiliary aids and services are available upon request to individuals with disabilities.

Section-05 Compliance	P-0500200	Effective Date: 04/15/2021
Replaces TAWDB P-0500200 dated 06/18/2020 and EWDB Monitoring Policy and Procedure revised 2016		
Delaney Rea, GCWDB Chair		

15. Sustainability
16. Preparing and administering contracts and ensuring contract compliance
17. Responding to monitoring financial findings
18. Maintaining proper accounting records and adequate documentation in accordance with uniform administrative requirements;
19. Disbursing funds for salaries, contracts, wages, and vouchers
20. Ensuring independent audits of all contracted entities receiving seven hundred fifty thousand dollars (\$750,000.00) or more in DOL grant funds (A Non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program specific audit conducted

C. Performance may include the review of:

1. Client outcomes information
2. Other factors directly affecting the achievement of negotiated performance standards and other local performance indicators
3. Data validation
4. Other measures as required

D. Satisfaction may include the review by obtaining feedback, data, and outcomes of clients, worksites, partners, and other stakeholders to determine the quality, scope and satisfaction level of services offered and provided.

IV. Equal Opportunity and Nondiscrimination Statement: All recipients, and subrecipients/subgrantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

V. Action: The Executive Director is responsible for compliance of this policy. The Executive Director is responsible for annual review and revisions if needed. Any exceptions to this policy statement will require prior written approval from the GCWDB Executive Director or chair of the Green Country Workforce Development Board.

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Auxiliary aids and services are available upon request to individuals with disabilities.

Section-05 Compliance	P-0500200	Effective Date: 04/15/2021
Replaces TAWDB P-0500200 dated 06/18/2020 and EWDB Monitoring Policy and Procedure revised 2016		
Delaney Rea, GCWDB Chair		

This policy will be effective immediately upon approval of the GCWDB membership.



04/15/2021

Chair, Green Country Workforce Development Board / Date

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Auxiliary aids and services are available upon request to individuals with disabilities.