

Monitoring and Resolution Policy No. MP-304, Change 2

Subject: **Monitoring Procedures**
Effective: PY19 - August 19, 2019

BACKGROUND

The Workforce Innovation and Opportunity Act (WIOA) requires recipients of federal financial assistance awarded under Title I to conduct regular oversight and monitoring of its WIOA programs and those of its sub-recipients and contractors as required under Title I of WIOA, as well as under Section 2 CFR 200, including 2 CFR 200.327, 200.328, 200.330, 200.331 , and 2 CFR 2900.

OBJECTIVE:

The purpose of monitoring activities is to identify strengths and weaknesses in the program operations and minimize risk for local boards. Monitoring serves as a way to provide technical assistance and resources to Sub-recipients (Service Providers) as they are held accountable for the appropriate and effective expenditure of funds, as well as the scope of activities associated with the implementation of WIOA. To ensure the WCCNM follows the requirements provided through the state administrative entity's monitoring provisions and respective responsibilities of the local boards, sub-recipients, and contract service providers. [1 1.2.19.7. NMAC - N,7/1/2018]

PROCEDURE:

The Workforce Connection of Central New Mexico (WCCNM) will monitor its own grant-supportive activities to include the development of local-level monitoring plans, tools and processes.

- A. WCCNM's monitoring and resolution procedure (consistent with Section 2 CFR part 200) will be used in monitoring both program and fiscal operations. Each year, WCCNM shall develop their own local-level monitoring plan that includes:
 1. The schedule or timetable for monitoring WIOA funded activities; and
 2. Identification of type of review planned, such as on-site review, comparative financial analysis, desk review, staff analysis, or other types of appropriate reviews.
- B. Monitoring Controls: To ensure comprehensive and effective monitoring, WCCNM must adhere to the following:
 1. Require periodic reports from their Administrative Entity/Fiscal Agent outlining monitoring reviews, noncompliance issues, and the status of corrective actions;
 2. Perform an annual evaluation of the monitoring function to determine its effectiveness.
- C. Reporting and Resolution Requirement

1. WCCNM and the Administrative Entity/Fiscal Agent shall ensure monitoring reports identify instances of noncompliance with applicable federal, state, and local laws, regulations, contract provisions or grant agreements, policies, and official directives, and provide recommendations for corrective action and program quality enhancements.
2. WCCNM and the Administrative Entity/Fiscal Agent shall ensure timelines are established for the completion of corrective action based on the severity of the deficiency, and shall work with the contract service provider to ensure implementation of corrective actions.
3. Timelines shall ensure that a copy of all monitoring reports is made available to all local board members. [1 1.2.19.8 NMAC — N, 7/1/2018]
Findings that result in disallowed costs will require the initiation of an audit resolution to begin debt collection and appeal procedure consistent with the Single Audit Act of 1996 and OMB Circular A-133 and the Grant Officer provisions of Subsection 667.510.

D. General Process/Flow

1. Monitoring Schedule developed (fiscal and program)
2. Monitoring Tools updated to reflect current file data to review
3. Entrance Conference Letter to Providers developed and mailed prior than 10 days
4. Entrance Conference Meeting with Providers
 - a. Entrance Conference Check – Off Sheet
 - b. Provider request list to be answered and data provided by a set due date
5. Program and Fiscal Monitoring, utilization of:
 - a. Monitoring Tools (Program and Fiscal)
 - b. Review of physical and/or electronic files/documents
 - c. OJT/CT Worksite Interview Sheet
 - d. Adult/Dislocated Participant Interview Sheet
 - e. Youth Worksite Interview Sheet
 - f. Youth Participant Interview Sheet
 - g. Adult/Dislocated Staff Interview Sheet
 - h. Youth Provider Staff Interview Sheet
6. Program and Fiscal Monitoring Report
7. Exit Conference Letter developed and sent 10 days prior to meeting
8. Exit Conference Meeting
 - a. Review of all monitored areas
 - b. Corrective Action – if applicable
 - c. Corrective Action due date set – if applicable
9. Closeout letter and packet (program and fiscal) developed, signed and mailed out to Providers