



Subject: CCWI Monitoring Policy

Purpose: To transmit Coastal Counties Workforce Board’s policy on monitoring

Statutory Authority: 29 USC §3122, 3123, 3141 and 3248, 20 CFR §679.370(i)(1-3) and (p); 20 CFR §683.410; 2 CFR Part 200; 29 CFR Part 38

Action: WIOA Service providers are required to adhere to all policies and guidelines set forth in the policy below.

Effective Date: April 1, 2007

Revision Date(s): September 23, 2010, January 12, 2012, September 12, 2019; December 14, 2023

Expiration Date: Indefinite

I. Monitoring Purpose: Workforce Innovation Opportunity Act

The local Workforce Board, in partnership with the chief elected officials, is responsible to monitor all of its WIOA Title I sub-recipients, at least annually, for programmatic compliance. The Board must ensure that the use, management, and investment of funds for workforce development activities maximize performance outcomes under WIOA. See 20 CFR 679.370 (i)(1-3).

In accordance with 20 CFR §683.410, each recipient and subrecipient of funds under title I of WIOA must conduct regular oversight and monitoring of its WIOA program(s) and those of its sub-recipients. Coastal Counties Workforce, Inc. (CCWI), will be responsible for conducting programmatic monitoring to ensure compliance with WIOA federal, state and local regulations and for providing technical assistance as necessary and appropriate.

Definitions

“Subrecipient” means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a federal awarding agency (2 CFR § 200.93).

As per 20 CFR § 683.410 (a),each subrecipient of funds under Title I of WIOA must conduct regular oversight and monitoring of its WIOA programs and those of its subrecipients and contractors in order to:

- Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the Act and the regulations in this part;

- Determine whether there is compliance with other provision of the Act and the WIOA regulations and other applicable laws and regulations;
- Assure compliance with 2 CFR part 200; and
- Determine compliance with the nondiscrimination, disability and equal opportunity requirements of WIOA, 29 USC 3248, including the Assistive-Technology Act of 1998, 29 USC 3033; (20 CFR § 683.410 (a));WIOA Section 188; 29 CFR Part 38

II. CCWI Monitoring Scope and Frequency

A. Scope

- 1. Performance Monitoring** includes but is not limited to the assessment of:
 - a. Planned service levels
 - b. Fiscal and administrative compliance
 - c. Program operation and compliance
 - d. Expenditures and reporting
 - e. Actual performance against performance outcome goals

- 2. Compliance Monitoring** of program activities and services to participants includes but is not limited to:
 - a. Review of intake and referral processes
 - b. Review of customer flow and quality of services to ensure services are universal, easy to access, and that both program participants and employers are served in a timely manner
 - c. Review of the eligibility determination process and certification
 - d. Review of assessment tools
 - e. Review of on-the-job training programs, work experience and supportive services;
 - f. Program results or outcomes
 - g. Performance measures
 - h. Record keeping and file maintenance
 - i. Data recording and reporting, including data integrity and quality
 - j. Policies and procedures

- 3. Compliance Monitoring** of program administration and management practices includes but is not limited to:
 - a. Review of fiscal and accounting procedures
 - b. Review of internal control systems
 - c. Review of financial and fiscal reports
 - d. Review of administrative controls
 - e. Review of non-discrimination/EEO compliance, policies and procedures
 - f. Budget methodologies
 - g. Cost allocation plans and processes/Indirect Cost Rates
 - h. Management practices
 - i. Cash disbursement compliance documentation

B. Frequency

The WIOA Title IB service provider programs will be monitored on an annual basis by CCWI. Monitoring is an ongoing active which occurs during the year through:

- a. Monthly review of monthly expenditure reports
- b. Monthly and quarterly review of spending, plan implementation and performance reports
- c. Monthly meetings with WIOA Title IB management team to review fiscal and programmatic performance and compliance
- d. Monthly desk review of electronic participant files
- e. Annual site review
- f. Annual and ongoing customer satisfaction surveys

III. Monitoring Procedures

A. Notification

CCWI will notify the service provider to schedule the annual site visit at least ten business days in advance. The notification will include the expected timeframes of the site visit. CCWI will schedule the monthly management team meetings with the service provider's management team for the year at the start of every fiscal year.

B. Monitoring Instruments and Process

1. File/Desk Review

State WIOA policy PY 15-21 requires WIOA service providers to maintain a paperless system; doing so enable reviewers at all levels (Federal, State, and Local) to monitor files directly through Maine JobLink.

Instrument: CCWI will use a modified version of the BES File Review Checklist & Form for its adult, dislocated worker, and youth file reviews.

Process: CCWI will conduct monthly desk reviews of adult, dislocated worker, and youth files. CCWI will review five files each month. CCWI will review a total of 20 adult, 20 dislocated workers, and 20 youth files a year. Files will be randomly selected.

2. Participant Interviews

Instrument: CCWI will use a modified version of the BES Participant Interview Questionnaire for its adult, dislocated worker, and youth file interviews.

Process: Participant interviews will be conducted in conjunction with the file review in order to maximize understanding of the service provider's approach to programs and customers. CCWI staff will conduct participant interviews in person or by phone. The goal is to interview, to the extent possible, two active participants per program per county who will be randomly selected based on the process outlined above. The Service Provider will notify CCWI in the event participants selected are not available or are unwilling to participate in interviews. Conversely, CCWI will randomly select replacement participants in an attempt to reach the target number of interviews. CCWI will use its discretion as to whether or not enough participants have been scheduled for interviews or interviewed.

3. Site Review

Instrument: CCWI will use a modified version of the MDOL/BES on-site review checklist for its site review monitoring of the adult, dislocated worker and youth programs

Process: CCWI will conduct an on-site review of its service provider on an annual basis to ensure programmatic compliance with WIOA Section 188. A formal exit interview between the sub-recipients and CCWI will be conducted at the conclusion of the review to discuss results of the review.

Note: CCWI may conduct site visits of its service provider as deemed necessary outside of the annual WIOA monitoring.

4. Report

A written report will be sent to the sub-recipients within 30 days of completion of the on-site monitoring visit. The sub-recipients will be given no less than 15 working days to correct or explain the findings and report back to the Board. Resolution actions will continue at the direction of the Board until all findings have been resolved.

IV. Accessibility for Individuals with Disabilities

Pursuant to 20 CFR §679.370(p) and on an annual basis, CCWI will conduct or, cause to be conducted, an assessment of the physical and programmatic accessibility of the one-stop center in Coastal Counties region in accordance with WIOA, 29 USC 3248, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 ([42 U.S.C. 12101 et seq.](#)).

LWIB Approved: 12/14/2023