

<b>Policy Number</b>	<b>AREA12-200</b>
<b>Subject</b>	WIOA Program Monitoring and Oversight
<b>Board Approved</b>	
<b>Revisions Approved</b>	N/A
<b>Effective Date</b>	
<b>This Policy Obsoletes</b>	N/A
<b>Reference to State Policy</b>	N/A

### 1. Purpose:

The purpose of this policy is to describe how oversight and monitoring of WIOA programs and the One-Stop delivery system will be conducted to ensure compliance, provide a framework for continuous improvement, and impact innovative policy development and program performance.

### 2. Background:

Workforce Innovation and Opportunity Act (WIOA) Section 107(d)(8) requires the Local Board, in partnership with the Chief Elected Official (CEO), to conduct oversight of WIOA programs and the One-Stop delivery system in the local area.

Proposed regulation requires that sub-grantees must continuously monitor grant- supported activities in accordance with uniform administrative requirements. Each sub-grantee must conduct regular oversight and monitoring of its WIOA activities and those of its sub-grantees and contractors. The purpose of this requirement is to ensure that expenditures meet the cost category, cost limitation requirements, and other compliance provisions of the WIOA.

### 3. Policy:

1. The Workforce Investment Board of Butler | Clermont | Warren (WIBBCW) shall conduct an on-site review of each WIOA sub-recipient on an annual basis. Programs to be included are WIOA Title I Adult and Dislocated Worker Programs as well as (CCMEP) Youth Program, and include Ohio Means Jobs (OMJ) Centers in Butler, Clermont, and Warren Counties (OMJ | BCW).
2. All sub-recipients must retain client files for 3 years. The files will be retained onsite at the OMJ Center where services last took place.
3. The sub-recipient shall conform to contractual obligations in regard to access, maintenance and contents of participant, program and financial files.
4. The sub-recipient will receive a letter identifying findings and observations, or no findings and observations, issues within 30 days after the on-site review.

5. Should corrective action be required as a result of the monitoring, WIBBCW staff will notify the sub-recipients, in writing, of corrective action to be undertaken and a time frame in which corrective action should take place.
6. Should corrective action not be fully implemented, WIBBCW staff will notify the sub-recipient of possible non-compliance of the articles within the contracts resulting in termination of the provider contract. WIBBCW staff will refer provider contracts that appear to be in non-compliance to the respective County Prosecutor's Office for the appropriate recoupment procedures and/or legal action. Prior to imposing the sanction, WIBBCW staff shall notify Ohio Department of Job and Family Services (ODJFS), in writing, of the proposed action.
7. Should a sanction be imposed, the sub-recipient shall be notified in writing of its right to appeal.
8. All records of on-site monitoring will be written and will be maintained in WIOA's files.
9. On-site monitoring will be conducted and initial reports will be completed within the time frames to allow for proper evaluation of monitoring results prior to the awarding of additional contracts.
10. WIBBCW and its sub-recipients shall maintain their financial systems in accordance with Generally Accepted Accounting Principles (GAAP). On-site fiscal monitoring will be conducted at least annually and/or when there is a possibility that a violation of the contract may have occurred. A written monitoring report will be completed for each on-site visit.
11. Any policies/procedures mandated by ODJFS State fiscal will be applied and adhered to.