

## GENERAL PROGRAM MANAGEMENT POLICIES AND PROCEDURES

### MEMORANDUM #08-09

**To: All Subrecipients**

**Subject: Monitoring Policy**

**Effective Date: June 15, 2009**

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#### **A. POLICY**

Workforce Development Council Snohomish County (WDCSC) is responsible for continuously monitoring subrecipients of funds under the Workforce Investment Act (WIA) in a number of areas. WDCSC fulfills this statutory responsibility as described in Section 188 of WIA are described below.

- (1) WDCSC has established and adheres to appropriate systems for the award and monitoring of agreements with subrecipients. The system contains acceptable standards for accountability and includes the acquisition of threshold documentation of the administrative capacity of each subrecipient.
- (2) WDCSC enters into written agreements with subrecipients that establish clear goals and obligations in unambiguous terms.
- (3) WDCSC acts with due diligence to monitor the implementation of these agreements including the carrying out of the monitoring activities described below.
- (4) WDCSC takes corrective action related to performance issues and violation of WIA, associated regulations, State provisions, WDC policy, and subrecipient agreements.

#### **B. SPECIFIC MONITORING PROCEDURES**

The specific monitoring and related procedures conducted by WDCSC to fulfill its responsibilities include the following:

- (1) Submission of and annual Monitoring Plan as required under State Provision Number 3425, *Monitoring and Oversight Requirements for Compliance Reviews*;
- (2) A thorough review of invoices and supporting documents submitted by subrecipients, monitoring to assure that expenditures have been made appropriately against cost categories and within cost limitations;
- (3) A thorough review of invoices submitted by subrecipients to monitor planned versus actual expenditures;
- (4) A thorough review of management information system documents submitted and entered into the Management Information System to monitor planned versus actual performance and equity in service delivery;
- (5) Provision of ongoing training and technical assistance to subrecipients;
- (6) Provision of ongoing consultation to subrecipients on the topics of fiscal invoicing and documentation, MIS procedures, documentation of eligibility and service delivery, performance management, and program service delivery design;
- (7) Provision of ongoing hands-on training and consultation with Site Operator quality control review staff;
- (8) On-site monitoring of subrecipients in conformance with the annual Monitoring Plan to be conducted at least annually with follow up as indicated in resultant monitoring reports.

**C. AREAS OF PROGRAM MANAGEMENT AND OPERATION TO BE MONITORED AND TOOLS**

WDCSC will utilize documents generated by the Washington State Employment Security Department Employment and Training Division State Monitoring Unit to perform on-site monitoring of program management and operation in the following areas:

- Adult Program Review
- Dislocated Worker Program Review
- Grievance Procedures
- Internal Control
- Individual Training Accounts
- Management Information Systems
- Personnel, EEO, and Nondiscrimination
- Property Management
- Welfare to Work Program Review
- Youth Program Review

This review will be conducted by WDCSC staff with expertise in each of these compliance areas. Staff will also review randomly selected participant files for completeness, accuracy, and internal consistency of documentation.

**D. ACTION STEPS**

WDCSC will issue a Preliminary Monitoring Report within 90 days of completion of the on-site visit.

The subrecipient will have 30 days from the date of WDCSC's initial report to respond, if it so chooses. The subrecipient may request an extension if it is unable to respond within the 30 day period.

WDCSC will issue a Final Monitoring Report within 30 days following the completion of the second 30 day period.

Any Final Monitoring Report which identifies a compliance exception, administrative issue, negative observation, or non-performance under the Workforce Investment Act, associated regulations, State provisions, local policy, the Strategic or Operations Plan, or the organization's subcontract shall require a written corrective action plan as described in General Program Management Policies Memorandum #\_\_-10, *Corrective Action*.