



Capital Region Workforce Development Board

Subrecipient Monitoring Policy

Adopted 12/9/2022

PURPOSE

[TA 21-05](#) Communicates the responsibilities of Chief Local Elected Officials (CLEOs) and Local Workforce Development Boards (LWDB) to perform remote and/or onsite Financial, Program, and Performance oversight and monitoring of subrecipients in Local Workforce Development Areas (LWDAs).

For information regarding LWDB responsibilities related to the New York State Department of Labor's (NYSDOL) remote and/or onsite monitoring of LWDBs, please see WDS [TA 21-04](#).

The Capital Region Workforce Development Board, in partnership with the CLEO's designated fiscal agent, must conduct remote and/or onsite subrecipient monitoring of WIOA programs and the One-Stop Career Center System in the LWDA. The LWDB will work with the CLEO, or the CLEO's designated fiscal agent, to ensure quality program activities are provided, verify fiscal integrity and compliance, and help the subrecipient meet performance targets.

CURRENT SUBRECIPIENTS

City of Albany Department of Youth and Workforce Services

Rensselaer County Department of Employment & Training (CLEO designated fiscal agent)

Schenectady County Job Training Agency

MONITORING POLICY

Purpose:

1. Determine that expenditures have been made against the cost categories and within cost limitations specified in regulations.
2. Determine whether or not there is compliance with other provisions and regulations and other applicable laws and regulations.
3. Provide technical assistance as necessary and appropriate.

Monitoring shall be conducted primarily for the purposes described above. However, the following additional benefits are expected:

1. To assist in meeting program objectives and improving systems for efficient program administration.
2. To assist in improving the quality of services provided participants.
3. To provide a basis for program revision.
4. To assist in planning for each subsequent program year.

Monitoring shall occur through interviews, observations, and program data evaluation. The mandated annual on-site monitoring will be conducted. Such monitoring is to ensure compliance with regulations, and relevant OMB circulars. The monitoring process shall include, but not be limited to the review of systems, activities and services.

Staff who will conduct monitoring reviews:

The Director/Commissioner, or their designee staff person, of the CLEO designated fiscal recipient will conduct and coordinate monitoring reviews. Each sub-recipient will be provided at least two-weeks notice prior to an on-site monitoring.

Entities to be monitored / Staff who will conduct monitoring reviews:

Listed below are the organizations that will be monitored, a description of their WIA Title IB role, an explanation of the type of monitoring to be conducted, and the titles of the person(s) responsible for conducting the monitoring:

1. City of Albany Department of Youth and Workforce Services
 - a. This office is the WIA Title IB partner in the consortium responsible for operating the One-Stop Career Center in Albany City/County. Programmatic monitoring of all grants received by WIOA will be conducted by Director/Commissioner, or their designee staff person, of the CLEO designated fiscal recipient. Fiscal monitoring of all grants received by WIOA will be conducted by the CLEO designated fiscal agent.

2. Schenectady County Job Training Agency

- a. This office is the WIA Title IB partner responsible for operating the One-Stop Career Center in Schenectady County. Programmatic monitoring of all grants received by WIOA will be conducted by Director/Commissioner, or their designee staff person, of the CLEO designated fiscal recipient. Fiscal monitoring of all grants received by WIOA will be conducted by the CLEO designated fiscal agent.

3. Rensselaer County Department of Employment & Training (CLEO designated fiscal agent)

- a. This office is the WIA Title IB partner responsible for operating the One-Stop Career Center in Rensselaer County. As this office is also the CLEO designated fiscal agent, programmatic monitoring of all grants received by WIOA will be conducted by Executive Director of the Workforce Development Board, or their designee staff person. Fiscal monitoring of all grants received by WIOA will be conducted through Rensselaer County and by NYSDOL through annual auditing, as required in OMB Circular A-133.

- 4. Youth Providers. When the CRWDB approves any youth subcontracts, programmatic and fiscal monitoring will be conducted by each subrecipient who contracts with the Youth Provider.

Process for development and implementation of monitoring guides:

The Capital Region Workforce Development Board will use the current NYSDOL monitoring guides

Monitoring Topics

Fiscal Topics:

- Cost Allocation
- Cost Limitations & Categories
- Cost Allowability
- Financial Reporting
- Expenditure Rates
- Confirmation that OMB Circular A-133
- Audit Requirements are fulfilled by subcontractors

Programmatic Topics:

- Eligibility and Records Review
- Delivery of Services
- Quality of Services
- Customer Satisfaction
- EEO Requirements/Grievance Procedures
- Data Validation
- Performance Requirements

Each program year comprehensive monitoring will be performed and a follow-up review will take place to verify that corrective action to any deficiencies has occurred. Where compliance monitoring alone cannot achieve the ends of managerial monitoring (to identify cause and appropriate corrective action), the Workforce Development Board Director will determine the scope of additional systems monitoring. Issues that may result in additional monitoring include:

- Subrecipients with prior audit or monitoring findings or history of poor performance
- Programs administered by inexperienced subrecipients
- Subrecipients that have inexperienced staff or have experienced a change in key staff
- Programs where the subrecipient has requested an on-site visit
- Subrecipients that are not financially stable
- Subrecipients that have not conformed to terms and conditions of previous awards

Programmatic monitoring shall produce standardized reports of monitoring and self-evaluation activities, and the observations resulting therefrom. The reports shall make recommendations for corrective action (improvement) whenever it identifies, non-compliance with Federal, State or contractual requirements, or identifies needs to improve existing systems, procedures, or practices.

Fiscal Monitoring will occur on annual basis. Desk Reviews will be performed insuring that all subrecipient fiscal reports and cash reimbursement requests fall within the approved contract budget. Written reports will be completed comparing the contract budget to the actual costs incurred.

Monitoring activities shall include:

- Appropriate and comprehensive reviews as delineated above.
- Written reports providing sources, findings of the review, causal factors, and possible options for improvement. If corrective action is necessary, recommendations will be included.
- The Subrecipient Director will review findings, causal factors, options and recommendations.

Findings

All subrecipients or contracted service providers will receive immediate feedback on any issues as well as a formal request for corrective action. Any request for corrective action will be made to the sub-recipients or contracted service providers in a written report within thirty days of discovery. Sub-recipients or contracted service providers will be given thirty days to respond with a corrective action plan. A final plan must be implemented within thirty days, and will be verified at that time by the WDB Director. Failure to correct the findings may result in fiscal penalties or the termination of the contract.

Process for Development and Issuance of monitoring Reports:

Written reports will be developed for all on-site visits of sub-recipients and contracted service providers. Written reports will not be generated for monthly desk audits. All reports will be issued by the LWDB forty-five (45) calendar days from the date the Monitoring Review was completed. If for some reason the release of the report is delayed, LWDB staff will notify the subrecipient with an updated timeline. A copy of all written reports, responses, and back-up material/documents/notes collected in conjunction with each review will be maintained on file in administration and appropriately cataloged for future reference.

All written reports and work papers will be maintained in a file located at the CLEO fiscal agent's office and made available for review by federal and state DOL officials.

The distribution list for the written report:

- The agency being reviewed (subrecipient)
- LWDB Chair (or designated LWDB member(s) to receive the report)
- LWDB Executive Director (if this person is not the individual that performed the monitoring and is signing the written report)
- The appropriate NYSDOL Financial Oversight and Technical Assistance (FOTA) and Program representatives
- Grant Recipient CEO (and subrecipient CEO if the report is for the subrecipient CEO's county).

Process for Providing Technical Assistance

In addition to formal remote and/or onsite monitoring reviews and written reports, the Capital Region Workforce Development Board will provide ongoing technical assistance to subrecipients, especially if/when a subrecipient requests assistance. Technical assistance includes actions that help subrecipients achieve positive performance outcomes, maintain data integrity, and help identify potential fiscal and programmatic system vulnerabilities. Technical assistance is ongoing and can be provided remotely and/or onsite. More in-depth technical assistance is available upon request and can include video conferences, WebEx training, and onsite visits. Programmatic technical assistance will be made available to all subrecipients by the WDB Director and designated staff. Fiscal technical assistance will be made available to all subrecipients by the CLEO fiscal agent and will be overseen by the Capital Region Workforce Development Board. The level and intensity of technical assistance to be provided will be determined by the given circumstances. On-site technical assistance will be made available during on-site visits.

Periodic CEO and LWDB monitoring of LWDA subrecipients is not only a regulatory requirement ensuring the staff of subrecipients are informed about program policy and regulations but is also a tool that can be used to support the subrecipients with technical assistance as necessary. Information on the specific monitoring topics and the frequency with which monitoring must be completed is detailed below.

LOCAL WORKFORCE DEVELOPMENT BOARD (LWDB) REMOTE AND/OR ONSITE MONITORING TOPICS AND FREQUENCY GUIDE

LWDB staff conduct remote and/or onsite Fiscal, Program, and Performance oversight and monitoring of Workforce Innovation and Opportunity Act (WIOA) subrecipient programs and the One-Stop Career Center System in their Local Workforce Development Area (LWDA). The following details the topics and frequency for monitoring.

1. Fiscal Monitoring

Fiscal monitoring of LWDB subrecipients must, at a minimum, include the following topics and monitoring intervals:

- Subrecipient Monitoring – Annually.
- Financial Management/Cost Allocation – Annually.
- Procurement – Every two years.
- Property Management – Every two years.
- Desk Reviews of Expenditure Reports – Monthly.

2. Program Monitoring

Program and Performance monitoring of LWDB subrecipients must, at a minimum, include the following topics and monitoring intervals:

- WIOA Title I Adult – Annually.
- WIOA Title I Dislocated Worker – Annually.
- WIOA Title I Youth – Annually.
- Trade Act – Annually.
- Subrecipient Contract Reviews – Quarterly.
- Desk Reviews of Performance monitoring of LWDB subrecipients – Quarterly.

REFERENCES

- WIOA 20 CFR 697.370(i) and 683.410(a)
- WIOA Section 107(d)(8)
- NYSDOL WDS TA #21-05: Monitoring Remote and/or Onsite Subrecipient Oversight and Monitoring Responsibilities for Chief Elected Officials (CEOs) and Local Workforce Development Boards (LWDBs)

FOR INQUIRIES

CRWDB Executive Director

CapitalRegionWDB@capreg.org