

**Workforce
Development Board
Of
Southeast Missouri**

**Compliance
&
Monitoring
Policy**



WORKFORCE DEVELOPMENT BOARD OF SOUTHEAST MISSOURI
Compliance and Monitoring Policy

1. Oversight function is performed by members of the Workforce Development Board (WDB) staff, programmatic and fiscal. WDB staff work at the direction of the WDB President, and the board itself, to verify that the Workforce Innovation and Opportunity Act (WIOA) regulations are being upheld and the sub-contractors/sub-contracted staff are performing according to proposals submitted and contracts signed.
2. The WDB has charged WDB staff to conduct monitoring as staff is not authorized to operate programs. Monitoring includes but is not limited to fiscal expenditures, WIOA program compliance and eligibility, NGCC compliance as well as Toolbox compliance. WDB staff report to the Youth Action Network and the WDB the results of the sub-state monitoring and any issues that were discovered.
3. Monitoring documents are used to evaluate program compliance issues. These documents are updated annually to reflect new directives as issued by the Division of Workforce Development (DWD) or as requested by the WDB, President/COO, or Chief Local Elected Official (CLEO).
4. WDB fiscal staff monitors contracts through the normal course of spot checking and when conducting their fiscal audit each program year. Onsite fiscal monitoring occurs once each fiscal year. Monitoring consists of accounting standards based upon but not limited to applicable federal and state requirements. WDB fiscal staff monitors on a monthly basis to ensure youth expenditures are in line with WIOA regulations (75% OSY, 20% WBL, etc.) No payments are made to sub-contractors until all eligibility documentation, length and payment of participant training, participant employment plans, participant activities, and Toolbox entries have been verified.
5. WDB staff will monitor a percentage of career-only enrollments and a percentage of new WIOA past career enrollments per program (funding source-Adult, Dislocated Worker, Youth) during the first and second quarter of each contract year based on the direction of the WDB President and the WDB. WDB staff will also monitor appropriation programs during program operation to reduce compliance issues. A random technique will be used to identify the selection of files. All forms for eligibility documentation, services rendered, and payments are compared to Toolbox for data entry accuracy.
6. Participant files are reviewed for WIOA eligibility, priority of services, complaint and grievance procedures, employment plans, need for services past career, On-the-Job Training contracts, training plans, supportive services, assessments provided, outcome attainment, supplemental data, 5% over income, 5% barrier of "needs additional assistance", and the appropriateness of participant payments. WDB staff also monitors sub-contractors for compliance with WIOA, NGCC, Fair Labor Standards Act, Americans with Disabilities Act, and Child Labor Laws.
7. WDB staff performs regular monitoring visits of each sub-contractor/Job Center to insure that services and partner referrals are made available to all participants. WIOA participant files are counted once each program year. This insures that for every WIOA Toolbox entry there is a file.
8. An official letter is sent to each sub-contractor/Job Center by the President/COO of the WDB when the sub-state monitoring has been completed. This letter identifies the results of the sub-state monitoring, concerns identified, any compliance issues from prior reviews, and if previous compliance issues were found were they no longer a concern (state and/or local). Performance reviews are provided to the WDB and the CLEO on an annual basis.
9. The WDB adheres to all Federal Equal Opportunity guidelines.