

Workforce Innovation and Opportunity Act (WIOA)

Oversight and Monitoring Policies

DRAFT

Oversight and Monitoring

Contents

9.1.0.0 State Program Oversight and Monitoring.....	3
9.1.1.0 Iowa Workforce Development Roles and Responsibilities	3
9.1.1.1 Administration and Governance	4
9.1.1.2 Workforce Development Program Delivery	5
9.1.1.3 Fiscal Management	6
9.1.1.4 Performance and Reporting Management	7
9.1.2.0 Oversight Methods	8
9.1.2.1 Random Sampling	9
9.1.2.2 Risk Assessment	10
9.1.2.3 Desk Review	11
9.1.2.4 On-Site Visit.....	12
9.1.2.5 Customer Satisfaction Survey	13
9.1.2.6 Data Validation.....	14
9.1.3.0 Oversight Process.....	16
9.1.3.1 Timeframe.....	16
9.1.3.2 Notification	17
9.1.3.3 Entrance Conference	18
9.1.3.4 Exit Conference	19
9.1.3.5 Monitoring Report	20
9.1.3.6 Resolution	21
9.1.4.0 Technical Assistance	22
9.2.0.0 Local Program Oversight and Monitoring.....	23
9.2.1.0 Local Workforce Development Board Roles and Responsibilities	23
9.2.2.0 Conducting Oversight.....	24
9.2.2.1 Oversight Methods	24
9.2.2.2 Oversight Process.....	25
9.2.2.3 Oversight Tools	26
9.2.2.4 Technical Assistance	27

9.1.0.0 State Program Oversight and Monitoring

9.1.1.0 Iowa Workforce Development Roles and Responsibilities

Effective date: TBD

Iowa Workforce Development (IWD), on behalf of the Governor, is responsible for oversight of the activities of its grant subrecipients to ensure proper stewardship of federal Workforce Innovation and Opportunity Act funding. Therefore, IWD will monitor each Local Workforce Development Board's programs, functions, and activities to assure compliance with applicable federal requirements and performance expectations.

IWD will use oversight methods to ensure compliance with federal, state, and local statutes, regulations, contract provisions, grant agreements, policies and directives. IWD will use oversight and monitoring to identify promising practices, areas of concern, and findings and to determine opportunities for technical assistance and improvement of program and administrative functions.

Primary Responsibilities

The goal of oversight is to examine the following functions and activities of the Local Workforce Development Board, at a minimum, annually. IWD is not limited to this list and may review other areas as necessary, or upon request. Areas of review may be conducted as a standalone review or incorporated into other monitoring reviews, including:

- Administration and Governance
- Workforce Development Program Delivery
- Fiscal Management
- Performance and Reporting Management
- Additional review areas, as applicable

Legal References

- WIOA sec. 116, sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.1.1 Administration and Governance

Effective date: TBD

Pursuant to applicable federal and state legislation, regulations, policies and guidance, and the Office of Management and Budget Circulars and Uniform Guidance, Iowa Workforce Development's review of Local Workforce Development Board administration and governance includes, but is not limited to, an evaluation of:

- Local governance
- Local plans, modifications and agreements
- Local board compliance and certification
- Local board sub-committees
- One-stop operator certification
- Organizational structure
- Memorandum of Understanding
- Administrative policies and procedures
- Subrecipient capacity to provide oversight
- Americans with Disabilities Act (ADA) compliance
- Non-discrimination and civil rights provisions
- Equal Opportunity requirements
- Sunshine provision compliance

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.1.2 Workforce Development Program Delivery

Effective date: TBD

Pursuant to applicable federal and state legislation, regulations, policies and guidance, and the Office of Management and Budget Circulars and Uniform Guidance, Iowa Workforce Development's review of Local Workforce Development Board program delivery includes, but is not limited to, an evaluation of:

- Program management and standards
- Program policies and procedures
- Service delivery
- Access to services
- Integrated service delivery
- Participant eligibility
- Services to priority and special populations
- Record retention and case file maintenance
- Subrecipient monitoring activities
- Support services
- Training services
- Follow-up services
- Youth activities
- Data analysis
- Data element validation

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.1.3 Fiscal Management

Effective date: TBD

Pursuant to applicable federal and state legislation, regulations, policies and guidance, and the Office of Management and Budget Circulars and Uniform Guidance, Iowa Workforce Development's review of Local Workforce Development Board fiscal management includes, but is not limited to, an evaluation of:

- Fiscal agent responsibilities and activities
- Fiscal policies and procedures
- Fiscal plans and agreements
- Subrecipient monitoring activities
- Cost allocation and allowability
- Resource sharing
- Cash management practices
- Procurement practices
- Internal controls
- Reporting requirements
- Closeout procedures
- Audits
- Subcontract compliance
- Program income and reporting
- Property management
- Record retention
- Generally Accepted Accounting Principles adherence
- Payroll administration

Fiscal Agent Roles and Responsibilities

In the event a fiscal agent is designated for a Local Workforce Development Area, the local fiscal agent may assist with fiscal monitoring, as deemed appropriate by the Local Workforce Development Board and Chief Lead Elected Official. Local fiscal agents must develop policies and procedures to demonstrate adequate oversight of grant funds in accordance with Oversight Process.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.1.4 Performance and Reporting Management

Effective date: TBD

Pursuant to applicable federal and state legislation, regulations, policies and guidance, and the Office of Management and Budget Circulars and Uniform Guidance, Iowa Workforce Development's review of Local Workforce Development Board performance and reporting management includes, but is not limited to, an evaluation of:

- Performance measures and program outcomes

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

DRAFT

9.1.2.0 Oversight Methods

Effective date: *TBD*

Iowa Workforce Development (IWD) will utilize, at a minimum, the following methods to conduct monitoring oversight of Local Workforce Development Boards:

- Random sampling
- Risk assessments
- Desk reviews
- On-site visits
- Customer satisfaction surveys
- Data validation

IWD is not restricted to using only the aforementioned methods, and may incorporate other methods as determined necessary.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.2.1 Random Sampling

Effective date: TBD

Iowa Workforce Development will select a predefined volume of samples at random to be used to review service delivery of each Local Workforce Development Board (WDB). The goal is to select a random sample equal to 10% of the total participant count for each program during the program year through the review period. The sample may include up to 100% of the participant count for each program if the total participant count is limited, or if problems are identified at any point during the monitoring process.

The participant case file review sample size selected for each Local WDB will be compiled from the total participant population served by each program for the review period. Thus, the number of participant files to be reviewed may vary by Local WDB.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.2.2 Risk Assessment

Effective date: TBD

Iowa Workforce Development (IWD) will evaluate each Local Workforce Development Board's (WDB) risk of noncompliance with state and federal statutes, regulations, and terms and conditions of subawards. This helps ensure subawards are used for proper, reasonable, necessary, and authorized purposes to achieve performance goals.

The risk assessment will consider the following risk factors:

- Reorganization
- Design and Governance
- Program and Grant Management
- Service Delivery
- Performance
- Additional factors, as determined necessary throughout the monitoring process

The risk assessment will be completed pre and post monitoring. The pre-monitoring assessment is based on IWD's knowledge of, history with, and learned information about the Local WDB, its service providers and contractors, and its programs and activities. It is used to help guide the scope of monitoring of each Local WDB. High risk assessments, for example, may result in increased sample pools.

The post-monitoring assessment is based on information gathered during the monitoring process, which may impact or mitigate a pre-monitoring risk factor score, and is used in planning monitoring activities for the following program year.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410
- 20 C.F.R. §200.331

9.1.2.3 Desk Review

Effective date: TBD

Iowa Workforce Development (IWD) will conduct desk reviews of each Local Workforce Development Board's (WDB) programs and related financial and participant data to ensure compliance and to identify potential or recurring problems in order to prepare for more in-depth on-site visits, and to conduct additional systematic and continuous oversight.

The desk review includes a review of the Local WDB's performance goals and its required components. It also includes, but is not limited to, a review and/or examination of other program and fiscal related materials such as contracts or subcontracts, previous monitoring reports, corrective action plans, and file reviews. IWD is not restricted to this list and may review other areas as necessary or upon request. Areas of review may be conducted as a standalone review or incorporated into other monitoring reviews.

The desk review may indicate a Local WDB's promising practices, areas of concern, and findings, as well as serve as a basis for prioritizing on-site visits and developing questions for the on-site review.

Legal References

- WIOA sec.183
- 20 C.F.R. §683.410

9.1.2.4 On-Site Visit

Effective date: TBD

Iowa Workforce Development (IWD) will conduct annual on-site monitoring reviews of each Local Workforce Development Board (WDB) in accordance with Timeframe. On-site visits may be conducted as a standalone review or incorporated into other monitoring reviews at the discretion of IWD.

On-site visits may include, but are not limited to: an entrance and exit conference, a tour of the American Job Center, participant file reviews, and interviews with the Local WDB subrecipient, contract service provider, staff, One-Stop Operator, and the customers and employers who received services.

IWD will utilize on-site visits to:

- Assure the Local Workforce Development Board is complying with appropriate policies and procedures, and operating within the parameters established by:
 - The Workforce Innovation and Opportunity Act (WIOA), and its corresponding regulations
 - State policies and procedures
 - Local policies and procedures
 - Uniform Guidance 2 C.F.R. Part 200 and 2 C.F.R. Part 2900
 - Nondiscrimination and Equal Opportunity provisions applicable to employment and service delivery
- Evaluate the one-stop service delivery system
- Assess the quality of services provided to job seekers, program participants, and employers
- Assess the impacts of workforce programs for customers within the Local Workforce Development Area
- Evaluate the management and administration of WIOA-funded grants to determine if program operations are compliant and whether the Local Workforce Development Board is on track to achieve grant goals and outcomes
- Identify promising practices, areas of concern, and findings
- Identify technical assistance needs and make recommendations for improvement

Legal References

- WIOA sec. 128, sec.133, sec. 184, sec. 188
- 20 C.F.R. §683.410
- 29 C.F.R. §38

9.1.2.5 Customer Satisfaction Survey

Effective date: TBD

Iowa Workforce Development (IWD) is responsible for collecting and analyzing feedback from customers, including job seekers, participants and employers. Therefore, IWD shall develop and disseminate customer satisfaction surveys to customers throughout each program year.

Customer satisfaction surveys invite feedback about:

- The way in which customers access services
- The types of services customers received
- Overall satisfaction with services provided

IWD will disseminate the aggregated results of the Local Workforce Development Area to the Local Workforce Development Board. Aggregate statewide results will be used in the State Workforce Innovation and Opportunity Act Annual Report.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §677.160, §683.410

9.1.2.6 Data Validation

Effective date: TBD

Data validation is a series of internal controls and quality assurance techniques established to verify the accuracy, validity, and reliability of data. Programs under the Workforce Innovation and Opportunity Act (WIOA) must collect and report accurate data and program information to ensure reported performance outcomes accurately reflect actual performance. The United States Departments of Labor and Education, require states to validate the accuracy of their annual performance report submissions to ensure decisions about Workforce Innovation and Opportunity Act policy and funding are made based on a true picture of program outcomes.

Data validation includes a series of internal controls and quality assurance techniques that must be carried out by the State and local programs to:

- Verify data reported by the State is valid, accurate, reliable, and comparable across programs
- Identify anomalies in the data and resolve issues that may cause inaccurate reporting
- Outline source documentation required for common data elements
- Improve program performance accountability through the results of data validation efforts

Data Integrity Review

Quarterly performance reviews are completed to evaluate for data errors, missing data, out of range values, and anomalies. These reviews are to assure compliance with applicable Federal requirements, and programmatic performance expectations are being achieved.

Data Validation Review

Annual data element validations are conducted to ensure the data elements in participant records are accurate in order to maintain system integrity, ensure completeness of data, and to identify and correct specific issues associated within the reporting process. The effectiveness of the data validation process will be assessed annually and revisions will be made as needed.

Iowa Workforce Development (IWD) Responsibilities

When conducting data validation review, IWD will:

- Conduct data element validation on DOL-only elements.
- Implement a sampling methodology of participant files and provide annual data validation training for appropriate program staff.
- Provide annual data validation by conducting a file review of data elements against source documentation.
- Provide a summary of data validation results to Local Workforce Development Boards to include technical assistance when needed.
- Provide an annual review of the effectiveness of the data validation policy and process and make necessary revisions as needed to improve data validation in the State.

Joint Data Validation

The State WIOA core partners are required to ensure annual data element validation on the 24 common data elements when co-enrollment exists. These elements were selected based on their importance to reporting accurate performance outcomes and to ensure data consistency across core programs. IWD will provide:

- Annual data validation by implementing a sampling methodology of participant files and conducting a file review of the 24 common data elements against source documentation.
- Annual data validation training for appropriate program staff.
- A summary of data validation results to Local Workforce Development Boards to include technical assistance when needed.
- An annual review of the effectiveness of the data validation policy and process and make necessary revisions as needed to improve data validation in the State.

Legal References

- WIOA sec. 116, sec.128, sec.133, sec. 184
- 20 C.F.R §200.328, §200.303, §677.240, §683.410
- TEGL 7-18
- TEGL 10-16, Change 1

DRAFT

9.1.3.0 Oversight Process

9.1.3.1 Timeframe

Iowa Workforce Development (IWD) will conduct an annual on-site monitoring review of each Local Workforce Development Board's fiscal compliance in accordance with 2 CFR 200, as required by the Workforce Innovation and Opportunity Act.

IWD has established a more strategic method for programmatic and performance monitoring through the implementation of the data management system, which allows for more comprehensive desk reviews of participant files in accordance with Desk Review. On-site programmatic and performance monitoring of each Local Workforce Development Board (WDB) will be conducted at a minimum of once per program year. Monitoring may also occur at the discretion of IWD, or as need is indicated by a Local WDB.

IWD will collaborate with Local WDBs to prepare and distribute annual monitoring schedules near the beginning of each program year to include the date and time of the desk review and on-site monitoring. This schedule may be subject to change at any time at the discretion of IWD.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410
- 2 C.F.R. §200

9.1.3.2 Notification

Effective date: *TBD*

In accordance with Timeframe, Iowa Workforce Development will prepare and distribute annual monitoring schedules near the beginning of each program year. In addition, IWD will provide Local Workforce Development Boards (WDB) additional written notification of intent to monitor, at a minimum, 15 business days prior to the commencement of each review.

The written notification of intent to monitor will include the review timeframe, the monitor(s) assigned to conduct the review, a list of priority areas to be reviewed including a schedule of on-site activities, along with general instructions on how the Local WDB should prepare for the review.

In the event the timeframe indicated in the written notification of intent to monitor is no longer feasible for the Local WDB being monitored, the Local WDB must contact IWD immediately, or within 10 business days of the review timeframe identified. The Local WDB and IWD will coordinate an alternative timeframe for on-site monitoring to be conducted. However, IWD reserves the right to conduct unscheduled monitoring reviews at any time, as appropriate.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.3.3 Entrance Conference

Effective date: TBD

During an on-site review, an entrance conference will be conducted upon the review team's arrival at the American Job Center. The entrance conference is held with the Local Workforce Development Board (WDB) director, in accordance with Local Board Staff, and any other Local WDB members or program staff the Local WDB director wishes to invite.

In the absence of a Local WDB director, the entrance conference will be held with the Local WDB chair, as well as any other Local WDB members or program staff the Local WDB chair wishes to invite.

The purpose of the entrance conference is to introduce the review team and to explain the monitoring process and expectations, agenda, logistics and schedule for conducting the on-site review. This meeting also provides for an opportunity to have an open discussion about the results of the Local WDBs risk assessment and discuss preliminary results of the desk-review.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.3.4 Exit Conference

Effective date: TBD

During an on-site review, an exit conference will be conducted upon completion of the review with the Local Workforce Development Board (WDB) director, in accordance with Local Board Staff, and any other Local WDB members or program staff the Local WDB director wishes to invite.

In the absence of a Local WDB director, the exit conference will be held with the Local WDB chair, as well as any other Local WDB members or program staff the Local WDB chair wishes to invite.

The purpose of the exit conference is to discuss observations, potential review findings, any outstanding action items, and next steps including the final written report and the resolution of identified issues in accordance with Resolution.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.3.5 Monitoring Report

Effective date: TBD

Iowa Workforce Development (IWD) will issue a monitoring report to the Local Workforce Development Board within 30 business days from the conclusion of the monitoring review, summarizing the oversight activity results, which may include findings and required corrective actions, areas of concern and suggestions and promising practices.

Findings and Required Actions

Findings are identified as issues or practices non-compliant with federal, state and/or local statutes, regulations, terms and conditions of an award or contract, policies and directives. Each finding will have a corresponding required corrective action identifying what action must be taken, or documentation provided, in order for a finding to be resolved.

Areas of Concern and Suggestions

Areas of concern are issues, policies, or practices observed during the review that negatively impact the ability to effectively manage the grant or provide services to participants. They may also include red flags or risk areas that, if not addressed and corrected, could lead to an area of non-compliance in future monitoring reviews. Each area of concern will have a corresponding recommendation for correcting the issue or practice.

Promising Practices

Promising practices are practices or outcomes identified during the review that are observed as being effective or innovative.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.1.3.6 Resolution

Effective date: TBD

The final monitoring report, in accordance with Monitoring Report, will reflect whether or not corrective action is required. If a corrective action plan is required, the Local Workforce Development Board (WDB) must:

- Submit a corrective action plan and supporting documentation electronically to iwd.WIOA@iwd.iowa.gov regarding the identified findings within 20 business days of receipt of the final monitoring report. The corrective action plan must identify actions the Local WDB will take to correct the findings and a timeline by which the actions will be completed.
- Within 20 business days of the receipt of the corrective action plan, Iowa Workforce Development (IWD) will review the plan and make an initial determination addressing the acceptability of the implemented or planned corrective actions to resolve any findings.
- If findings are not resolved within 20 business days of the date of the initial determination, the Local WDB will be required to provide an additional response, evidence and documentation, as applicable, to justify administrative actions. The Local WDB may also be required to provide a progress report that describes the progress they have made towards correcting the findings identified. Further oversight activities may be conducted at the discretion of IWD.
- If findings remain unresolved after the timeline specified in the initial determination, a final determination will be issued identifying the unresolved findings. The process described above will continue until all findings have been resolved. All findings must be resolved within 6 months of the initial monitoring report's issuance.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410, §683.420

9.1.4.0 Technical Assistance

Effective date: TBD

Technical assistance is an ongoing activity vital in addressing performance and encouraging an environment of continuous improvement. Iowa Workforce Development (IWD) will proactively assist Local Workforce Development Boards by issuing policy guidance, sharing best practices and training in order to help resolve operational issues as they arise and to assist in improving on areas that are working well. IWD will also offer technical assistance as a part of the on-site monitoring review, as needed.

Technical assistance may include, but is not limited to, training or support to improve the following:

- Assessment processes and methodology
- Performance
- Record-keeping
- Procurement and contracting
- Case management
- Monitoring of services and providers
- Use of the data management system
- Follow-up services
- Linkages with business and workforce system partners and stakeholders
- Effective use of staff and resources
- Staff development

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.2.0.0 Local Program Oversight and Monitoring

9.2.1.0 Local Workforce Development Board Roles and Responsibilities

Effective date: TBD

Local Workforce Development Boards (WDB), on behalf of the Chief Lead Elected Official (CLEO) for the Local Workforce Development Area, must conduct on-site monitoring of all contracted service providers at least annually or, for contracts lasting less than one year, once during each contract term for financial and programmatic compliance.

Local WDBs must also ensure that the use, management, and investment of funds for workforce development activities are consistent with 2 CFR 200 and maximize performance outcomes under section 116 of the Workforce Innovation and Opportunity Act. Local WDBs must develop policies and procedures to demonstrate adequate oversight of grant funds. Policies and procedures regarding monitoring of One-Stop Operators must be in accordance with Monitoring of One-Stop Operators.

Primary Responsibilities

Local WDBs must conduct oversight, which may include, but is not limited to:

- Administration and Governance
- Workforce Development Program Delivery
- Fiscal Management
- Performance and Reporting Management
- Additional review areas, as applicable

Responsibilities in Consultation with Iowa Workforce Development (IWD)

Local WDBs must provide IWD current documentation such as the local plan, contracts, Memorandum of Understanding, grants, sub-grants, reports, and records applicable to programs administered by IWD. At the beginning of each program year, Local WDBs must review the above noted documents and ensure through written correspondence that IWD possesses current copies of applicable documentation.

Additionally, Local WDBs must submit the Local WDB approved monitoring report and resolutions to IWD for review at the time of issuance. If IWD determines failure by a Local WDB to provide periodic, thorough monitoring for two consecutive program years, the Local WDB will be sanctioned in accordance with sec. 184 of WIOA to include, but not limited to, suspension of WIOA grant funds until such time as IWD determines adequate Local WDB compliance with Local WDB monitoring requirements and responsibilities.

Local WDBs must electronically submit new or updated documents, and monitoring reports and resolutions to: iwd.WIOA@iwd.iowa.gov.

Legal References

- WIOA sec. 116, sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.2.2.0 Conducting Oversight

9.2.2.1 Oversight Methods

Effective date: TBD

Local Workforce Development Boards (WDB) will utilize, at a minimum, the following methods to conduct monitoring oversight of contracted service providers:

- Random sampling
- Risk assessment
- Desk review
- On-site visit
- Customer satisfaction survey
- Other necessary methods, as applicable

Local WDBs are not restricted to using only the aforementioned methods, and may incorporate other methods as determined necessary.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.2.2.2 Oversight Process

Effective date: TBD

As part of their oversight role, each Local Workforce Development Board (WDB) and fiscal agent must develop written policies and procedures for oversight and monitoring of United States Department of Labor funded programs and delivery of services to ensure compliance with federal, state, and local administrative and financial requirements, policies, and procedures, and to ensure performance goals are being achieved.

Written policies and procedures must describe, but are not limited to:

- The roles and functions of the Local WDB, board staff, and fiscal agents in their oversight and monitoring processes.
- The entity, and the title of the individual, who shall be responsible for the monitoring of each program activity.
- The types of reports which shall be prepared as a result of such monitoring.
- To whom reports will be distributed.
- The scope and frequency of monitoring efforts for each program activity consisting of:
 - Monitoring activities utilizing a monitoring document, desk reviews, on-site visits, or other methods of oversight in accordance with Oversight Methods, resulting in a written report.
 - Conducting on-site reviews of policies, plans, and procedures governing all segments of their program activities and operations at least once during the program year.
 - Conducting a pre-award financial review or on-site post-award monitoring of contract service providers no later than 120 calendar days after the award of the contract.
 - Monitoring each contract service provider providing services to participants for program accountability and to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts. Fiscal agents must monitor each contract service provider annually, and no less than 60 calendar days prior to the expiration date of the contract.
 - Reviewing a sample of participant files to determine compliance with required federal, state, and local laws, policies, plans and procedures.
- The methods which shall be utilized for the monitoring of program activities in accordance with Oversight Methods.
- The methods which shall be utilized for procurement and financial monitoring in accordance with Fiscal Management.
- The entity, and the title of the individual, who shall be responsible for ensuring corrective actions are taken when problems or issues are found.
- The timeframe for resolution of corrective actions.
- Guidelines for subsequent monitoring, when necessary, to determine if corrective action and resolution has been completed.
- A process for addressing disagreements.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.2.2.3 Oversight Tools

Effective date: TBD

Local Workforce Development Boards (WDB) must develop written oversight tools that assist the Local WDB in conducting a thorough review of programs and activities. The varying requirements of each funding stream involved must be taken into consideration when designing the tools and determining the most effective activities to be used. The tool used for each oversight activity must be included with the final monitoring report.

Examples of oversight tools may include, but is not limited to:

- Risk Assessment Tool
- Monitoring Review Guide
- Corrective Action Tracker
- Corrective Action Plan Template
- Monitoring Report Template

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

9.2.2.4 Technical Assistance

Effective date: TBD

Technical assistance is an ongoing activity vital in addressing performance and encouraging an environment of continuous improvement. Local Workforce Development Boards must proactively assist contract service providers by issuing policy guidance, sharing best practices and training in order to help resolve operational issues as they arise and to assist in improving on areas that are working well.

Legal References

- WIOA sec. 128, sec.133, sec. 184
- 20 C.F.R. §683.410

DRAFT