

I. Purpose:

The purpose of this policy is to establish the process for monitoring of sub-recipients and contractors and the inclusion of the Southeast Tennessee Local Workforce Development Board (STLWDB) in monitoring and oversight activities.

II. Background:

As part of the oversight and monitoring role, each Local Workforce Development Board (LWDB) and fiscal agent shall establish policies and procedures to monitor WIOA-funded programs and the delivery of integrated services. LWDBs must ensure compliance at the federal, state, and local levels concerning administrative and financial requirements, policies, and procedures in order to ensure performance goals are being achieved.

III. Instructions:

The Southeast Tennessee Local Workforce Development Board's Quality Assurance Coordinator will conduct monitoring and oversight of all sub-recipients and contractors receiving WIOA funds. Monitoring shall include the programmatic and fiscal monitoring of each program activity and ensuring corrective actions are taken. Upon completion of monitoring activities, the Quality Assurance Coordinator will develop a formal written monitoring report detailing the results of the monitoring, including any necessary corrective action. The report will be submitted to the Workforce Director for review prior to issuing the final report to the entity. The final report will be issued within thirty (30) days of the completion of the review. Corrective Action shall require a response from the sub-recipient or contractor within ten (10) business days. Continued monitoring will occur if the Corrective Action Plan is deemed inadequate. Results of the monitoring will be reported to the Executive Committee of the STLWDB. The Executive Committee will submit results to the STLWDB during regular quarterly meetings.

A pre-award financial review will be performed on all new sub-recipients and contractors. Reviews of sub-recipients and contractors with little or no workforce program experience will be conducted during the first quarter of the awarded contract. Programmatic, fiscal, and procurement monitoring may be completed utilizing a variety of monitoring tools including, desktop reviews, on-site reviews, reviews of policies, plan and procedures governing all segments of program activities and program operations. Monitoring will be conducted at least once during the program year and must occur sixty (60) days prior to the expiration of the contract. The review may include examining program records, participant files, questioning employees, interviewing participants, policy reviews, and performing an on-site review for any entity receiving WIOA funds. All reviews will result in a summarized written report.

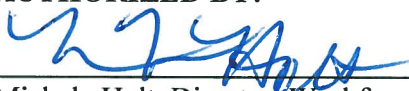
Procurement monitoring will determine compliance with general procurement standards outlined in 2 CFR 200.318 and will follow the STLWDB's Competitive Procurement Process.

IV. Appeals Process

In the event of a disagreement resulting from the monitoring process, the contractor and/or sub-recipient may choose to file an appeal. A disagreement is considered to have reached the level of an appeal when an issue arises that is not easily approaching a point of resolution. The Quality Assurance Coordinator will facilitate the dispute resolution via the Operations Committee to ensure that issues are being resolved appropriately through the appeal process as follows:

- a. Any disputes shall first be attempted to be resolved informally.
- b. Should informal resolution efforts fail, the appeal process must be formally initiated by the entity seeking resolution. A written notification to the Operations Committee must be submitted within ten (10) business days.
- c. The Operations Committee shall have a special called meeting to mediate and resolve the dispute. Disputes shall be resolved by a majority of the Operations Committee.
- d. The decision of the Operations Committee shall be final and binding unless such a decision is in a contradiction of applicable State and Federal laws or regulations governing the entity.
- e. The right of appeal no longer exists when a decision is final. Additionally, final decisions will not be precedent or binding on future conflict resolutions unless they are officially stated in this procedure.
- f. The Operations Committee will provide a written response and dated summary of the proposed resolution to all parties and the Executive Committee of the STLWDB.
- g. The Quality Assurance Coordinator will contact the petitioner and the appropriate parties to verify that all are in agreement with the proposed resolution.

AUTHORIZED BY:



Michele Holt, Director, Workforce Development

9/12/18

Date

APPROVED BY:



Tony Cates, Chair, Workforce Development Board

9-12-18

Date

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