



Higher Education Coordinating Commission Office of Workforce Investments Policy	
Subject: Monitoring System	
Focus:	<input checked="" type="checkbox"/> WIOA Title I <input type="checkbox"/> National DWG <input type="checkbox"/> State Grants <input type="checkbox"/> Other:
Publish Date: 03/23/2021	<input checked="" type="checkbox"/> New Policy <input type="checkbox"/> Revised Policy

Overview

The Workforce Innovation and Opportunity Act (WIOA) Final Regulations direct the Higher Education Coordinating Commission Office of Workforce Investments (OWI) to prescribe standards to be used for monitoring of funds awarded through Title I of WIOA.

Policy Statement

This policy provides standards that must be addressed and satisfied by OWI's oversight and monitoring of local workforce boards, and provides standards and requirements for local workforce boards, in partnership with the chief elected official for the local area, to conduct oversight of WIOA Adult, Dislocated Worker and Youth program activities and the entire one-stop delivery system in the local area, as defined in WIOA Regulations 20 CFR Part 678.

Effective Date

July 1, 2021

Required Action

OWI Monitoring

OWI will conduct regular oversight and monitoring of subrecipients and contractors providing WIOA Title I programs in order to determine:

- That expenditures have been made against the proper cost categories and within cost limitations.
- Whether there is compliance with other provisions of WIOA and the WIOA regulations and other applicable laws and regulations.
- That there is demonstrated compliance with 2 CFR Part 200.
- That there is demonstrated compliance with the nondiscrimination, disability, and equal opportunity requirements of WIOA.
- That local boards have completed monitoring in accordance with this policy.

OWI's system provides for annual monitoring reviews of each local area's compliance with 2 CFR Part 200, including on-site tests of administrative compliance elements, and ensures that established policies to achieve program performance and outcomes meet the objectives of WIOA Title I and WIOA regulations. The monitoring system determines if entities have demonstrated substantial compliance with WIOA requirements and determines whether a local plan will be disapproved for failure to make acceptable progress in addressing

any identified deficiencies. The system tests components of the local board's monitoring to ensure compliance with non-discrimination, disability, and equal opportunity requirements of Section 188, including Assistive Technology Act (EO/ADA).

State reserve funds awarded to local boards for statewide workforce investment activities (Section 128) and for statewide rapid response activities (Section 133) will be monitored on a schedule and scope identified upon award.

OWI's system requires prompt corrective action be taken if any substantial violation of standards is found. Further, OWI may impose remedies for noncompliance in the event of a subrecipient's failure to take required corrective action.

OWI is responsible for resolving subrecipient level findings from monitoring reviews, investigations, other Federal monitoring reviews, and audits of subrecipients awarded WIOA Title I funds.

Data Validation

Data element validation is incorporated into the state's monitoring system, and methodologies and written procedures for conducting review will be established, aligning with current DOL and state-level guidance (e.g. elements to be validated, allowable values, source documentation requirements, etc.). Regular data integrity reviews will be conducted quarterly, and missing data or anomalies will be addressed and resolved. OWI will conduct regular assessments of the effectiveness of the data validation process and revise this policy and related procedures as needed.

Local Workforce Development Boards

Local boards must establish standards for subrecipient monitoring to include managing, conducting and reporting the regular oversight of subrecipients and contractors providing WIOA Title I programs, and determining that expenditures have been made against the proper cost categories and within cost limitations. The local board's monitoring must also determine whether there is compliance with other provisions of WIOA and the WIOA regulations and other applicable laws and regulations. Compliance with 2 CFR Part 200 must also be ensured, and there must be demonstration of compliance with the nondiscrimination, disability, and equal opportunity requirements of WIOA.

A monitoring report or summary must be provided at least annually to the local board, the chief local elected officials, and OWI, along with annual programmatic and accessibility reports conducted to ensure that programs and offices are compliant with EO/ADAs standards. Local board policy must include this reporting requirement.

Contact

Questions are to be referred to hecc.owi-workforce-policy@hecc.oregon.gov.

References

WIOA Regulations 20 CFR Part 679.370(i) and 20 CFR 683.400(d)