

Workforce Alliance of South Central Kansas Monitoring Policy

Introduction

The purpose of this policy is to provide information and guidance regarding the monitoring of programs and operations in South Central Kansas (Local Area IV).

Staff designated by the Workforce Alliance of South Central Kansas (WA) shall conduct regular, periodic monitoring to determine compliance with federal regulations, state policies, and WA policies and procedures. Monitoring activities shall be based on the US Department of Labor's Core Monitoring Guide and shall include desk reviews, on-site visits, and telephone or virtual interviews with staff & participants as appropriate. The WA shall also contractually secure routine independent monitoring services to alleviate any potential conflicts of interest and maintain proper firewalls within the system.

The WA shall also conduct regular, periodic monitoring of subrecipients and contractors. The WA shall monitor the activities of subrecipients as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Subrecipient monitoring activities may include:

- Reviewing financial and performance reports required by the WA
- Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the WA detected through audits, on-site reviews, and other means
- Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the WA as required by §200.521 Management decision

Monitoring activities shall be conducted with such frequency and in such detail, both quantitative and qualitative, to provide reasonable assurance of compliance and effective program operations. Feedback regarding monitoring reviews shall be provided in a timely manner.

Monitoring Objectives

Program monitoring efforts are performed under the precept that the mission is not only to carry out a review process to identify weaknesses and areas of non-compliance, but also to provide an opportunity for technical assistance and training, identify best practices, allow sufficient time for corrective action, and follow up to ensure corrective action is completed.

Monitoring Areas of Emphasis

Compliance may include a review of:

- Eligibility determination
- Needs determination
- Progression towards performance achievement
- Other areas of service provision
- Administrative controls
- Personnel

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- Civil rights & ADA compliance
- Audit and audit resolution
- Facilities

Fiscal may include a review of:

- Review of the payment determination process
- Source documentation
- Traceability for all transactions
- Match and leveraged resources
- Budget control
- Cash management
- Program income
- Cost allocation
- Allowable costs
- Cost classification
- Financial reporting
- Training resource management
- Procurement
- Equipment
- Intangible property
- Sustainability

Performance may include the review of:

- Customer outcomes information
- Other factors directly affecting the achievement of Local Area IV negotiated performance standards and other local performance indicators
- Data validation

Satisfaction may include the review of:

- Interviewing customers to determine type and satisfaction of services received
- Interviewing worksites to determine type and satisfaction of services received

Monitoring Schedule

- Customer files will be reviewed periodically throughout each program year. A minimum of 10% of customer files shall be reviewed in a program year.
- Performance measures will be reviewed on a quarterly basis.
- Customer and worksite interviews will be conducted during routine program monitoring. A minimum of 10% of customers and worksites will be interviewed in a program year.
- All other areas will be reviewed once a program year.

Reports will be generated from regular monitoring data to present a timely, accurate and appropriate vehicle for staff reporting of program and overall operations efficiencies and deficiencies.