



June 5, 2023

Eastern Carolina Local Area Issuance No. 2022-14

SUBJECT: Eastern Carolina Workforce Development Board (ECWDB) Subrecipient Monitoring Policy

PURPOSE: To transmit policy regarding Subrecipient Monitoring to ensure the proper use of federal funds authorized under the Workforce Innovation and Opportunity Act (WIOA). The purpose of oversight and monitoring is to ensure that workforce development programs within the Eastern Carolina Workforce Development Board's 9-county region are operating in accordance with all applicable federal, state, local regulations and policies associated with all WIOA funded subrecipient agreements, and all appropriate administrative directives. Monitoring will be scheduled at least once a year, or anytime at the discretion of the ECWDB to ensure that all services and programs are designed and operating to achieve expected results, to ensure funds are being spent for authorized purposes, to ensure reliable and timely information is captured, reported, and utilized to improve decision-making, and to aid in corrective action prior to oversight by granters.

BACKGROUND: All subrecipients will be monitored both financially and programmatically for compliance annually and will be evaluated on a regular basis. Staff of the ECWDB will report outcomes of the monitoring to the Board. The Board will use the results of monitoring to evaluate the consistency of program results against expected goals. Results from monitoring reviews may also be used to analyze program performance and current and future program funding objectives.

ACTION: Monitoring of subrecipients by ECWDB will ensure that subrecipients are in compliance with state and federal guidance while using federal funds to achieve the outcomes and deliverables of the program under which they are funded. It also allows ECWDB to learn about innovations, best practices and/or identify if the subrecipient needs technical assistance.

POLICY: ECWDB is responsible for continuous monitoring of its contractually funded subrecipients. ECWDB will formally monitor all subrecipients on an annual basis for the duration of the contract. The annual programmatic and/or fiscal monitoring review may be conducted in-person at the service providers site or virtually through GoToMeeting, Teams or Zoom.

The following procedures outline the Local Area's program and financial monitoring and evaluation process to ensure continuous improvement practices are implemented:

- A pre-monitoring desk review is conducted. All pertinent files, contracts, charters, business plans, reports, budgets, invoices, and records relative to NCWorks are reviewed. Appropriate monitoring documents and questionnaires are completed, and statistical data from NCWorks are analyzed to evaluate performance.

- The appropriate WIOA Title I service provider is notified in writing of the Local Area's plans for a monitoring review. The notification letter identifies the areas to be reviewed and the anticipated time schedule.
- An entrance interview is conducted to outline the monitoring process and review the objectives of the monitoring.
- Selected customers are interviewed to assess their satisfaction with services provided through the Center.
- An exit interview is conducted at the completion of the monitoring review. The results of this review are shared with the subrecipient at this time. Any findings, observations and/or recommendations found through the review are discussed with the subrecipient. For any findings or observations, the specific laws, regulations, guidance, or policies violated or potentially violated are cited.

An observation means that the subrecipient has not Implemented a best practice that could lead to violations of policy, regulation, or law. An observation does not require a formal response from the subrecipient, but the subrecipient should take steps to implement any suggested action steps or technical assistance provided by ECWDB.

A finding means that the subrecipient is required to take a specified corrective action and provide ECWDB with written evidence that the corrective action has been implemented

- A written report is prepared within thirty (30) days of completion of the annual monitoring review.

REFERENCE: CPS 06-2022
WIOA Section 183

EFFECTIVE DATE: Immediately

EXPIRATION DATE: Indefinite

CONTACT: Director

DISTRIBUTION: WIOA Title I Service Providers



Tammy L. Childers, Director