

Jefferson-Lewis Oversight and Monitoring Policy and Procedures

Purpose

To implement a comprehensive system for oversight and monitoring of WIOA activities of subrecipients and contractors. The purpose of the monitoring is to ensure expenditures meet the programmatic, cost category and cost limitation requirements of WIOA and the regulations. Monitoring is also intended to ensure compliance with the provisions of WIOA regulations and other applicable laws and regulations, and that technical assistance is provided as needed.

Background

Jefferson County Department of Employment and Training (DET) is the Grant Recipient and One-Stop System Operator, and Lewis County is the subrecipient. A subrecipient is a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program. Jefferson County DET was selected as the system operator by the Jefferson-Lewis Workforce Development Board (WDB). As the system operator, Jefferson County DET operates all WIOA programs and disburses all WIOA funds through contracts or Individual Training Accounts (ITAs). In addition to the WDB/CLEO agreement there is a financial contract between Jefferson and Lewis counties that outlines the disbursement of funds.

Policy

Jefferson County DET will be responsible for monitoring and oversight of the WIOA activities in Lewis County. This includes fiscal, program and performance/management. This monitoring can be completed either on-site, remotely, or by a combination of the two. If any part of the monitoring is completed remotely, TA #18-05 will be followed to secure and protect PII (Personally Identifiable Information) and PPSI (Personal, Private and Sensitive Information). The Jefferson-Lewis WDB has a written agreement with the North Country WDB for program monitoring of Jefferson and Lewis Counties. Financial and performance/management monitoring of Jefferson County is described in the below sections.

Procedure

A. Fiscal Monitoring:

Fiscal Monitoring of Jefferson County DET is the responsibility of the New York State Department of Labor (NYSDOL) Financial Oversight and Technical Assistance (FOTA) office.

Fiscal Monitoring of Lewis County DET will be conducted by Jefferson County DET's Fiscal Manager. As per Technical Advisory #21-05, the Description of Topics and Frequency of Monitoring Reviews include:

- Subrecipient Monitoring – N/A to Lewis County as they have no Subrecipients
- Financial Management/Cost Allocation – Annually
- Procurement – Every two years
- Property Management – Every two years; and
- Desk Reviews of Expenditure Reports - Monthly

The Instruments that will be used for subrecipient monitoring will be the review guides attached to Technical Advisory #21-05. These review guides provide methodology for generating written reports regarding findings and corrective actions, so this information will not be restated here. Monitoring reports will be issued to the subrecipient within 45 days of the completion of the final exit conference of the review. Subrecipient will be given 45 days to respond and submit a corrective action plan. Follow-up on the corrective action plan will take place within 60 days of the receipt of the corrective action plan. Correspondence and visits will continue at appropriate intervals (no more than 30 days) until all findings are resolved.

NYSDOL will be notified as soon as possible after the discovery of any significant issues while a review is in progress. The monitor will proceed with the review as planned, modified only by any requests NYSDOL may have due to the issues presented. In notifying NYSDOL of significant issues discovered in the review, the Director of the Jefferson-Lewis (WDB) and the contact person at the Subrecipient location will be copied on the notification letter.

Upon completion of the monitoring, reports will be sent to the following

- The subrecipient - original
- Local Workforce Development Board (LWDB) Chair (or designated LWDB member(s) to receive the report) – copy
- Executive Director of the Jefferson-Lewis WDB – copy
- The appropriate NYSDOL FOTA and Program representatives – copy
- The grant recipient Chief Elected Official (CEO); and
- The grant sub-recipient CEO – if the report is for the sub-recipient CEO's county.

After a monitoring review is complete and resolved; the working papers, monitoring report, subrecipient responses, and all correspondence between the recipient and subrecipient regarding the findings and resolutions will be retained for seven years and will be made available for review by State and Federal officials upon request. Final monitoring reports are due to NYSDOL by June 30 of each year.

Technical assistance will be provided to subrecipients as soon as possible after receiving a written or verbal request from the subrecipient. Fiscal technical assistance will be provided by the Jefferson-County DET Fiscal Manager and Programmatic technical assistance will be provided by either the One-Stop Operator/Provider or the WDB Executive Director. NYSDOL will be contacted if that technical assistance requires help from them. The assistance will be provided in whatever format is necessary for the best possible outcome for the subrecipient with a follow up in written format with a copy provided to the Executive Director of the Jefferson-Lewis WDB and NYSDOL.

If monitoring reveals that a single audit was not conducted for a recently closed fiscal year, the Executive Director of the Jefferson-Lewis WDB will issue a letter to the subrecipient stating that all payments to the subrecipient will be held until such time that Jefferson County DET's Fiscal Manager receives a copy of the subrecipient's completed single audit report for that given fiscal year. For reference, Single Audit Reports are accessible and can be downloaded from <https://facweb.census.gov/uploadpdf.aspx> via search function <https://facdissem.census.gov/Main.aspx>.

B. Program Monitoring:

All components of WIOA activities will be monitored annually. A representative sample of participants that were enrolled in the program year being monitored will be drawn for folder and OSOS review. Those files will include Adult, Dislocated Worker, SCION, TAA and Youth. Program monitoring will be completed by staff of the North Country LWDA. Timeline for monitoring will be as follows:

- Files to be monitored will be for the program year that ended June 30th of the year before (e.g., PY21 monitoring is due June 30, 2023; PY22 monitoring is due June 30, 2024, etc.).
- The monitoring process includes a written report stating any findings or corrective actions needed and must be issued no later than 45 calendar days from the date the monitoring review was completed.
- Upon completion of the monitoring, the North Country LWDA will send the original report to the recipient through the LWDB Executive Director of the Jefferson-Lewis WDB or designated Executive staff for review. The Executive Director or designated staff will then share the report with the following:
 - The subrecipient
 - Local WDB Chair (or designated LWDB member(s) to receive the report)
 - The appropriate NYSDOL Program representatives
- Final monitoring reports are due to NYSDOL by June 30th of each year.

Monitoring topics to be reviewed will include all required items as outlined in TA #21-05. NYSDOL program monitoring guides will be utilized to ensure each required area of review is completed. Topics for review include, but are not limited to:

- Service delivery
- Participant eligibility and data element validation
- Priority of service
- Quality of services
- EEO requirements/grievance procedures
- Appropriateness of training services according to the LWDA Local Plan
- Follow-up services

Records will be retained by Jefferson County DET pertaining to monitoring for a period of seven years and will be made available for review by State and Federal officials as requested.

C. Performance and Management Monitoring:

Jefferson County DET, in conjunction with the Jefferson-Lewis WDB, monitors management and performance issues on a consistent basis. Jefferson County DET will continue to monitor performance, address issues, and develop corrective action plans as the need arises. Any issues or corrective actions will be reported and discussed in regularly scheduled staff meetings. Significant issues will be reported to NYSDOL as they occur. Areas of monitoring will include, but not be limited to:

- Legislated performance standards
- Costs efficiencies
- Data validation
- Trends and continuous improvement
- Customer flow through the system
- Training and business services related areas

Records will be maintained by Jefferson-County DET pertaining to monitoring and be made available for review by State and Federal officials.

Schedule

Monitoring of Fiscal functions will be conducted at least once per fiscal/program year during the months between January and June with specific dates to be determined and mutually agreed upon by the recipient and sub-recipient. The fiscal monitoring required to be performed during this six-month

window is detailed by type and periodicity in a bulleted list in section A on the first page of this policy and procedure.

Monitoring of Programmatic functions will be conducted at least once per program year as outlined in section B above.

Monitoring of Performance and Management functions occurs on a continual basis and is reported out and discussed at regularly scheduled meetings involving both recipient and subrecipient staff and management.