

	Policy No: P - 213
	Effective Date: July 1, 2026
	New ☐ Revised ☒
MONITORING SYSTEM POLICY	

PURPOSE

The purpose of this policy is to establish a framework for monitoring all programs, subrecipients, and service providers funded under the Workforce Innovation and Opportunity Act (WIOA). This ensures compliance with applicable laws, regulations, and grant requirements, and promotes effective program performance and fiscal integrity.

REFERENCES

20 CFR § 683.400; 683.410; 679.370(p)

WIOA Section 184, WIOA Section 185 and WIOA Section 188

2 CFR 200.332(g) and (h)

HECC-OWI Policy - Monitoring, Corrective Actions and Sanctions Policy

ANNUAL MONITORING PROCEDURE

Annual monitoring of each subrecipient and contractor shall be conducted to ensure compliance with WIOA rules and regulations or other funding requirements. This monitoring will consist of an on-site review and desk audit.

Risk Assessment

SOWIB will conduct a risk assessment to evaluate the potential risks associated with each subrecipient. Factors may include funding amount, program type, staff turnover, prior findings, and internal control strength. This assessment is ongoing throughout the contract period.

Monitoring Schedule

Each subrecipient will be monitored at least once per program year. Monitoring will be conducted on-site and remotely through desk audits. Subrecipients and contractors will be provided with the monitoring guide and have 30 days to complete and submit all attachments.

Upon receiving the guide and attachments, SOWIB staff will contact the provider to establish the date and time that the on-site monitoring will take place.

Monitoring Areas

Programmatic - Participant eligibility, service delivery, performance outcomes.

Fiscal - Allowable costs, time and effort reporting, procurement, internal controls. Specific transactions will be tested for allowability and appropriate documentation.

Administrative - Equal opportunity compliance, data validation, reporting, and physical and programmatic accessibility of service sites in the local area.

Monitoring Conclusion

SOWIB will review and determine contractual compliance and may request additional information and/or documentation that may be needed to ensure that any questions are resolved.

SOWIB staff will schedule an exit interview with the program administrator and fiscal manager to discuss monitoring results, identify any required corrective actions, and offer technical assistance.

SOWIB will provide a draft monitoring report within 30 calendar days after completion of the review. Subrecipients and contractors will have 30 days to respond with corrective action plans, if needed. SOWIB will consider any actions and return a final report to the contractor within 15 days of receipt of response. Where corrective action is required, SOWIB will conduct a follow-up review within 30 days.

As reports are finalized, SOWIB will ensure that monitoring reports are provided to members of the local workforce investment board, and the local elected officials.

PERIODIC/ON-GOING MONITORING

At a minimum, on a semi-annual basis, SOWIB Program Manager or designee will review the following provider records/processes for compliance:

90 Day Soft Exit - All participant records must show provision of services, at a minimum of every 90 days, preference is that no more than 30 days pass without a service. Electronic records will be reviewed to ensure on-going service is occurring, and if not, that there is a record of attempts made to re-engage the participant. If re-engagement does not occur, records should be properly case noted and an exit note entered.

Data Entry - Review of records will be done to ensure compliance with the entry of all data within five (5) business days.

Electronic Files - Electronic files will be reviewed to ensure timely uploading of documentation, plans, contracts and other supporting documents associated with participant participation.

Priority of Service - Provider tracking will be reviewed, in the event of a waitlist, to ensure that those customers meeting priority of service definitions are provided services prior to customers who do not meet these criteria.

General Compliance - During review of participant files SOWIB staff will review eligibility requirements and documentation and will also look for compliance with SOWIB policies and contract requirements.

Financial Review - On a monthly basis, planned obligations vs. actual billing will be reviewed to ensure that contract requirements for enrollments and spending are at an acceptable level for the period.