



PIEDMONT REGION

<b>Title:</b>	Monitoring Sub-recipients and Contractors Policy	<b>Policy #:</b>	29
<b>Effective Date:</b>	August 20, 2015	<b>Revision Date:</b>	January 10, 2020

**Purpose:**

The purpose of this policy is to establish a monitoring system which contains acceptable standards for ensuring accountability and compliance with the Workforce Innovation and Opportunity Act of 2014, federal and state laws and regulations, Uniform Grant Guidance and Department of Labor Employment and Training Administration (DOL-ETA) guidance.

**Policy:**

A member of the Virginia Career Works - Piedmont Region (VCW-P) staff will come on-site at a minimum of 1 time per year to review the following items:

1. Administrative – A review of the administrative functions highlights whether sub-recipients are compliant with all provisions in their provider contract.
2. Financial – A review of the financial functions ensures the adequacy of internal controls and the reliability of the sub-recipient’s financial management system as they relate to the contract.
3. Programmatic – A review of the programmatic functions ensures that the implementation of WIOA programs is compliant with all applicable regulations.

At the conclusion of the on-site visit, a written monitoring report will be developed for each sub-recipient monitored. If there are findings or concerns, a written corrective action plan (CAP) must be submitted by the sub-recipient to the VCW-P staff according to the timeframe set forth by the local area.

Compliance Area Guidelines

**Administrative Review Items**

Could include, but not be limited to the following:

1. Sub-recipient contract compliance
2. Contractor policies align with federal, state and local WIOA guidance
3. Adherence to Resource Sharing agreement/cost allocation
4. Adherence to associated MOUs/Operators agreements
5. Prior monitoring reports/corrective actions
6. Actual performance
7. Service provider Exit strategy

### **Financial Review Items**

Could include, but not be limited to the following:

1. Internal controls
2. Expenditures
3. Financial transactions/reporting
4. Reimbursement requests
5. Procurement
6. Cash Management
7. Payroll
8. Inventory
9. Cost allowability
10. Cost limitations and categories
11. Percentage of budget expended vs. number of contract months remaining
12. Cost allocation (if applicable – the type and method of the allocations and the formula used to derive the percentages)
13. Sub-recipient A-133 Audit requirements
14. Petty cash (if applicable)

### **Programmatic Review Items**

Could include, but not be limited to the following:

1. Participant File Review to include eligibility verification, program documentation, training documentation, VaWC codes, case closure verification and follow-up verification.
2. Equal Opportunity compliance within programmatic operations

In addition to the 1 on-site visit per year, many of these items will be reviewed throughout the year during the monthly reimbursement request process.