

**GRANTEE MONITORING POLICY****C-510****Purpose.**

The Southwest Wisconsin Workforce Development Board (SWWDB) emphasizes performance and places a high priority on the effectiveness of funded programs. Monitoring program operations is an important element in achieving intended performance. Furthermore, SWWDB, as a recipient of Workforce Innovation and Opportunity Act (WIOA) funding, has a responsibility to comply with applicable regulations. Conducting annual monitoring is a requirement of WIOA and other workforce and human service programs. This policy establishes SWWDB's responsibility to develop and maintain a monitoring process and the obligation to conduct annual monitoring for each funded program.

Policy.

The SWWDB, in compliance with state and federal regulations, shall conduct on-site monitoring of each grantee receiving program funds as a subrecipient through the SWWDB. Monitoring shall be conducted at least once annually in accordance with written monitoring procedures developed and maintained by SWWDB.

The SWWDB monitoring process is a review of the major activities of each funded program in relationship to the signed contract document to ensure efficient operations are aligned to achieve intended program performance outcomes. SWWDB shall maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

SWWDB monitoring staff shall:

- Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring;
- Monitor the activities of the subrecipient 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;
- Verify that every subrecipient is audited as required by 2 CFR 200 Subpart F—Audit Requirements when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded \$750,000; and
- Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

Subrecipients shall:

**GRANTEE MONITORING POLICY****C-510**

- Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the Act and the regulations in this part;
- Determine whether there is compliance with other provision of the Act and the WIOA regulations and other applicable laws and regulations;
- Assure compliance with SWWDB's contract;
- Assure compliance with GAAP;
- Assure compliance with 2 CFR part 200; and
- Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of WIOA Section 188, 29 CFR Part 38.

During the monitoring process, SWWDB staff shall also appraise the grantee's compliance with established federal, state, and local policies, procedures, and guidelines. The overall objective of monitoring is to assure compliance with applicable Federal requirements and program expectations, improve program operations, identify necessary corrective action, and provide for open, interactive communication between the grantee and SWWDB staff. SWWDB staff shall provide monitoring feedback using the Grantee Monitoring Report Form (Form C-510-A). SWWDB shall take prompt action when instances of noncompliance are identified. This shall include follow-up to ensure that the subrecipient takes timely and appropriate action on all deficiencies found. A closure letter shall be issued when all the concerns and findings have been resolved.

The Board directs the Chief Executive Officer (CEO) to develop and maintain on-site program monitoring procedures and systems that addresses the scope, frequency, and grantee performance standards. The scope of the monitoring process should include grantee program services and delivery systems, performance progress, participant file maintenance and accuracy, financial operations and recordkeeping, non-discrimination and equal opportunity compliance, and program operator issues. The SWWDB monitoring process shall fully comply with federal and state laws, regulations, and standards.

References: Uniform Guidance – 2 CFR 200 (200.303 (d), 200.318 (b), 200.328(a), and 200.331)
 Workforce Innovation and Opportunity Act sections 107, 108, 129, 134, 184, 188.
 Workforce Innovation and Opportunity Act – Notice of Proposed Rulemaking, 20 CFR § 683.410.
 Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act, 29 CFR Part 38

Policy Adopted: June 8, 2005
 Policy Revised: December 14, 2016; December 13, 2017