

Policy Number: 2023-1-11.0-ADWMP

Effective Date: This policy will go into effect immediately upon passage.

Purpose

This policy provides guidance regarding local oversight responsibilities for the administration of federal and state funding, including Workforce Innovation and Opportunity Act (WIOA). Oversight includes reviewing, monitoring, evaluation and technical assistance of WIOA Adult and Dislocated Worker funded services delivered. The Lucas County Workforce Development Board Area 9 (LCWDB) and the Lucas County Department of Planning and Development (LCDPD) will collaborate to monitor each recipient/sub-recipient for delivery of programs, customer's physical file and the State case management system, Advancement, Resources, Information and Employment Services (ARIES). Audits provide reasonable assurance of compliance with state and local LCWDB Area 9 policies, LCDPD internal procedures, state performance regulations, and award provisions applicable to WIOA programs.

Background

The Adult and Dislocated Worker program is monitored annually or as frequently as requested by state monitoring staff. LCDPD will conduct quarterly reviews or as frequently as requested based upon need. LCDPD is responsible for monitoring its recipients and sub-recipients' staff to ensure that all activities are in compliance with state and LCWDB Area 9 policies, LCDPD internal procedures, state performance regulations, and award provisions applicable to WIOA. As part of this monitoring, LCDPD, will also review performance measures to ensure improvements in process are met, priorities and strategies are implemented to improve Adult and Dislocated Worker outcomes and performance results. This local monitoring process will assist in ensuring the local workforce area and service providers are on track with meeting state and local performance requirements. The purpose of internal reviews is to prevent observations and findings of noncompliance from the state monitoring staff which would require proper documentation for failing performance measures in WIOA.

Policy Reference:

Ohio Department of Job and Family Services (ODJFS) will formally monitor all recipients receiving state or federal funding dollars in accordance with grant requirements on an annual basis for the duration of any agreements as required by WIOA Section 183 and OMB 2 CFR Part 200.

LCDPD will formally monitor all recipient and sub-recipients staff receiving state or federal funding dollars in accordance with grant requirements on a quarterly or on an as needed basis for the duration of any agreement.

- 1) LCDPD has established appropriate systems for procurement and awarding and monitoring of contracts with sub-recipients/recipients. The system establishes clear standards of accountability.

- 2) LCDPD developed a contract with an agreed Scope of Work with goals, obligations, and performance measurements in unambiguous terms;
- 3) The recipient and sub-recipient staff implementing WIOA must regularly attend trainings offered by ODJFS on WIOA Adult, Dislocated Worker and the ARIES system used for workforce case management.
- 4) LCDPD will take prompt and appropriate corrective action upon discovery of any evidence of violation of any federal, state provision and/or local CCMEP policies and sub-recipient agreement.
- 5) LCDPD reserves the right to end the contract with the sub-recipient/contractor for nonperformance, noncompliance, or failure to comply with corrective action. In addition, Workforce Area 9 and/or lead agency may require repayment of funds that are spent in a manner that does not meet program performance, local policy, state/federal regulation, or law.
- 6) If corrective action or fund repayment by the sub-recipient/contractor is required, such action will result in a loss of points in the competitive scoring for the next procurement for which the sub-recipient/contractor applies.

Definitions

Workforce Innovation Opportunity Act (WIOA): The programs under the Workforce Innovation and Opportunity Act (WIOA) that involve workforce investment systems. Title I of WIOA includes: statewide and local workforce investment systems, State and Local Workforce Policy Boards, One-Stop Systems, Eligible Training Providers for adults, dislocated workers and youth, Youth activities, Adult and Dislocated Worker Employment and Training Activities, Performance Accountability System, Job Corps, and National WIOA programs administered by the US Department of Labor.

Dislocated Worker: Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result. of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise; Is employed at a facility at which the employer has made a general announcement that such facility will close.

Sub-recipient: A non-federal entity that receives a sub-award for the purpose of carrying out part of a federal award. The sub-award creates a federal assistance relationship with the sub-recipient.

Performance Measures: Standards set by the Ohio Department of Jobs and Family Services (ODJFS) to determine the effectiveness of achieving program goals and objectives.

Observation: Sub-recipient/contractor has not implemented a best practice that could lead to violations of policy, regulation, or law, and the sub-recipient/contractor should take the appropriate actions to implement the steps outlined in the monitoring report.

Finding: Sub-recipient/contractor is required to take a specified corrective action and provide the workforce area and/or lead agency with written evidence that the corrective action has been implemented.

Continuous Improvement Plan (CIP): A plan that outlines corrective action within a local workforce investment area to ensure full compliance with federal and state law and WIOA regulations. This plan must be submitted by a local area when auditing or monitoring reveals compliance issues.

Corrective Action Plans (CAP): Observations and Findings may result in a Corrective Action Plan for the sub-recipient. CAPs are used to ensure that significant weaknesses discovered during the monitoring process are addressed timely by the sub-recipient to prevent any ongoing issues.

References

[WIOA Youth Policy Letters](#)

[WIOAPL No. 15-02.1](#) Adult and Dislocated Worker Eligibility

[WIOAPL No. 15-03.1](#) WIOA Youth Program Eligibility

[WIOAPL No. 15-04](#) Selective Service Registration

[WIOAPL No. 15-05](#) Serving Applicants with a Close Relationship to the Workforce Innovation and Opportunity Act Program

[WIOAPL No. 15-06](#) Determination of Dependent Status

[WIOAPL No. 15-07.3](#) Source Documentation for WIOA Title I Program Eligibility [Attachment A](#) and [Attachment B](#)

[WIOAPL No. 15-10](#) Youth Program Services

[WIOAPL No. 15-11.3](#) Use of Individual Training Accounts

[WIOAPL No. 15-19.1](#) Poverty Line and Lower Living Standard Income Level

[WIOAPL No. 15-20.2](#) Priority of Service for Veterans and Eligible Spouses

[WIOAPL No. 15-22.1](#) On-the-Job Training (OJT) Policy

[WIOAPL No. 15-26](#) ITA Financial Definitions

[WIOAPL No. 16-02.2](#) Eligible Training Providers

[WIOAPL No. 17-02](#) WIOA Adult, Dislocated Worker, and Youth Programs Performance Accountability

[WIOAPL No. 17-03](#) Procurement of the Comprehensive Case Management and Employment Program Provider for WIOA Youth-Funded Activities and Services

[WIOAPL No. 17-04.3](#) Waivers for Implementation of the Comprehensive Case Management and Employment Program

LCDPD Fiscal Monitoring Policy