

Mendocino County Workforce Investment Board

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MONITORING SUBRECIPIENTS

Policy No. 7A

PURPOSE:

- To provide the general standards for the Local Workforce Investment Board oversight responsibilities regarding the Workforce Investment Act (WIA).
- To provide instructions for the development of monitoring plans to implement those standards.

BACKGROUND:

The Workforce Investment Act Section 117(d)(4) requires that the Local Board, in partnership with the Chief Elected Official (CEO), shall conduct oversight of the WIA programs and the One-Stop delivery system in the local area.

DEFINITIONS:

Subrecipient means a nonfederal entity that expends federal awards received from a pass-through entity to carry out a federal program, but does not include an individual that is a beneficiary of such a program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency (OMB Circular A-133).

Vendor means a dealer, distributor, merchant, or other seller providing goods or services that are required for the conduct of the federal program. These goods or services may be for an organization's own use or for the use of beneficiaries of the federal program (OMB Circular A-133).

REFERENCES:

- WIA Directive WIAD00-7, Subject: Standards for Oversight and Instructions for Substate Monitoring (April 10, 2001)
- Title 20 Code of Federal Regulations (CFR) Sections 667.400 (c)(1), 667.410 (a), and 667.410 (f)(6)
- WIA Directive WIAD03-7, Subject: Audit Requirements (September 9, 2003)

POLICY:

- A. It is the policy of Mendocino County Workforce Investment Board (WIB) that each service provider contract will be monitored onsite at least once during the program year for fiscal integrity and programmatic compliance.

- B. Monitoring shall assure fiscal integrity. Such monitoring shall verify that WIA Title I funds are being utilized for allowable activities, that appropriate cost allocations are being utilized, and that proper fiscal records are being maintained.
- C. Monitoring shall assure that the procurement, receipt, and payment for goods and services received from vendors comply with laws, regulations, and the provisions of vendor contracts and agreements.
- D. Programs shall be monitored to assure that the training environment is safe and healthful for participants and staff.
- D. Programs shall be monitored to assure that an effective system is in place to handle nondiscrimination and equal employment opportunity issues.
- E. Monitoring shall follow a standardized review methodology that will result in written reports.
- F. Written reports will record the outcomes of each monitoring visit including any findings and required corrective actions, and due dates for accomplishment of the corrective actions.
- G. Written reports and other documentation pertaining to monitoring and other oversight activities must be made available for review by federal and State officials.
- H. Reports and other records of monitoring activities must be retained for four years from the date of submission of the final expenditure reports regarding the funding sources monitored. If any litigation, claim, audit or other action involving the records has been started before the expiration of the four year period, the records must be retained until completion and resolution of all such actions or until the end of the four-year period, whichever is later.

Title	Monitoring Subrecipients		
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Author			
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