



**Policy Number 6**  
**Issued: October 19, 2017**  
**Revised:**  
**By: Wyoming Workforce Development Council**

## **1.0 Purpose**

To communicate Wyoming's policy and procedures for oversight and monitoring of the Workforce Innovation and Opportunity Act of 2014 (WIOA) that includes: (1) an annual onsite review of WIOA funded programs through monitoring visits ; and (2) ongoing reviews of Operators and/or Service Providers' performance to assess the quality and level of performance. These activities are required to fulfill Wyoming's oversight responsibilities in accordance with WIOA.

## **2.0 Policy**

### Oversight and Monitoring of WIOA

2.1 Oversight and monitoring is a regular, systematic review of programmatic activities, administrative systems, and management practices to determine if they are appropriate, effective and in compliance with the Interagency Agreement, WIOA rules and regulations, Department of Labor (DOL) directives and the Wyoming Workforce Development Council (WWDC) policies and procedures.

2.2 Responsibility and Scope – Oversight and monitoring serve as an important mechanism to identify and document corrective actions, provide technical assistance and track progress. Monitoring is performed through desk reviews and onsite visits and may be contracted with a third party. Programmatic monitoring activities include but are not limited to a review of program and participant services to include the intake or referral process, eligibility certification, priority of service, registration, objective assessment, classroom training, On the Job Training (OJT), Work experience and supportive services. Monitoring also includes a review of program administration and management practices including reporting, internal control systems (e.g. protection of Personally Identifiable Information (PII)), and nondiscrimination and Equal Opportunity (EO) policy and procedures

2.3 Frequency – Programmatic monitoring is conducted each year with a minimum of one on-site visit per year.

2.4 Monitoring Report – Each on-site visit is documented by a written report. The monitoring reports are official records of WWDC and are used to review the Operators' and Service Providers' programs at a given point in time. The reports provide the background of the program, status of follow-up on previous findings (if applicable), current findings and recommendations (if any) for corrective action along with a timeline for implementation. The reports constitute the basis for future program assessment and evaluation.

2.5 Corrective Action – If gaps or deficiencies are found during the monitoring process, the monitoring report will include recommendations to address the identified problem areas. The type and extent of the issues identified will dictate the required corrective action. Recommended actions may include:



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- **Technical Assistance:** Monitor will recommend the provision of technical assistance or additional guidance when a deficient condition is caused by inadequate information or training.
- **Policy/Procedural Changes:** The monitor will submit the appropriate recommendations for procedural changes to result in acceptable performance.
- **Corrective Action Plan:** Monitor will recommend the creation of a corrective action plan if there are deficiencies which must be addressed by the Operator and/or Service Provider.
  - a) **Corrective Action Plan:** The monitor will work with the Operator and/or Service Provider to outline a corrective action plan which addresses the causes of the problem and aims to prevent future occurrence.
  - b) **Corrective Action Implementation:** Operator and/or Service Provider must implement the recommended corrective action within the timeframe indicated in the monitoring report. The implementation will be closely tracked by the monitor (1) to determine the overall efficiency and effectiveness of the approach, and (2) to measure progress toward resolving the problem. Operator and/or Service Provider are required to respond in writing to the monitor's recommendations to acknowledge that the corrective action plan is being implemented.

2.6 **Follow-up:** As a final step in the monitoring process, the monitor will follow-up on corrective action recommendations and results of any technical assistance. The monitor may also extend the target date for completion of the corrective action if the Operator and/or Service Provider request for extension is reasonable and provides justification for such action.

- **Methodology:** Follow-up may be achieved as follows:
  - a) **Desk Review:** If the monitoring finding can be addressed through the submission of documentation, follow-up may be achieved through verification of back-up documentation submitted by the Operator and/or Service Provider in response to a monitoring report finding.
  - b) **Off-Cycle Visit:** If the corrective action is crucial to the operation of the program or is required immediately to resolve a problem involving questioned costs, a follow-up visit may be scheduled to confirm that corrective action has been implemented.
  - c) **Part of Regular Monitoring:** If the corrective action will require more time to implement or is of a less severe nature, the action will be followed-up during the course of the next regular monitoring visit.

2.7 **Monitoring Tools:** Tools used in monitoring may include but are not limited to the following:



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- WIOA Compliance Checklists: The WIOA Programmatic Checklist (Attachment A) is a management tool used by monitors to ensure Operator and/or Service Provider are complying with legislative requirements of the WIOA Programs.
- Participant File Checklists: The Participant File Checklists (Attachments B and C) are used by monitors to conduct file reviews on a sampling of participant's information and aggregate program information through the review and analysis of Wyoming@Work data. All participant program activities and services will be examined to ensure programmatic compliance.
- Participant Interviews: Participant interviews allow monitors to understand the customer experience and validate the performance of the Operator and/or Service Provider from the perspective of the participant. Monitor will select a sampling of participants for interview.

### 3.0 Compliance with Federal and State Law/Regulation/Policy

- This policy complies with any and all federal and state laws, regulations and policies.

Attachment A - Programmatic Compliance Checklist

Attachment B - Adult and Dislocated Worker Participant File Monitoring Checklist

Attachment C - Youth Participant File Monitoring Checklist