

ATTACHMENT
M
Region VII WDB
Monitoring Policy

MONITORING POLICY

Effective Date: September 19, 2019

Background: Policy established herein results from guidance contained in WIOA Section 183.

The local WDB is required to conduct regular monitoring and oversight of their own activities and those activities of their sub-recipients in order to:

- A. Determine the expenditures are made against the cost categories and within the cost limitations specified by the WDB, WorkForce West Virginia, and the ACT;
- B. Determine whether there is compliance with administrative and programmatic provisions of contracts, Memorandums of Understanding, local policies, WorkForce West Virginia policies, and the ACT; and
- C. Provide technical assistance as needed and appropriate.
- D. Routine Equal Opportunity monitoring of service providers will be conducted by the respective WDB EO Officer no less than once a year.

The obligation to conduct monitoring and oversight activities requires recipients and sub-recipients to perform certain actions, including but not limited to:

- A. Developing monitoring tools and a schedule for on-site visits;
- B. Developing monitoring reports, requesting corrective action, conducting follow-up, and imposing sanctions (where permissible and appropriate); and
- C. Reviewing previous monitoring reports and other documentation as appropriate as part of monitoring and oversight responsibilities; and
- D. Provide training and assist agencies in developing corrective action plans to meet any deficient requirements.

Should applications of the WDB monitoring policy reveal issues requiring resolution the WDB will require prompt written corrective action to remedy any cited violation of the standards set forth in the local, state, and Federal regulations. If corrective action is requested and not implemented, the WDB may impose sanctions as prescribed by local, state, or Federal regulations.

In order to comply with the requirements of WIOA, the WDB has developed this monitoring protocol and tools contained herein to be used in reviewing all WIOA funded activities and/or sub-recipients.

Definition:

A sub-recipient shall be defined as follows:

A non-Federal entity that expends Federal awards received from a pass-through entity to carry out a Federal program but does not include an individual who is a beneficiary of such a

program. A sub-recipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Policy: The staff of the Region VII Workforce Development Board (WDB), as the appropriate administrative entity for the WDB and the Local Elected Officials, will conduct comprehensive on-site reviews of all WIOA funded sub-recipients no less than twice annually during each program year. Visits in local areas may include, but are not limited to, on-site reviews of training providers, comprehensive One-Stop Career Centers, and satellite centers, sub-recipients of WDB funds, and other locations or entities as deemed necessary and appropriate by the WDB. Resolution of any compliance issues shall be in accordance with the provisions of the Act, its regulations, and other applicable local and state laws or regulations.

Additional reviews will be conducted by the WDB as deemed necessary and appropriate. These additional reviews may include, but are not limited to, additional comprehensive on-site reviews, special on-site reviews to address specific issues or concerns, and paperwork reviews ("desk audits") of appropriate reports, documents, or other written or recorded materials.

For purpose of conducting its comprehensive on-site reviews, the WDB will utilize the attached monitoring tools. The attached instruments may be modified as needed by the WDB at any time, and may be used in whole or in part for the purpose of monitoring any WDB sub-recipient (including training providers). WIOA funded agencies are encouraged to utilize the tools contained herein to conduct self-analysis.

Scheduling: The WDB Director or designated representative will initially contact the agency for tentative monitoring dates. Once dates have been agreed upon by both agencies, a formal letter will be submitted to the agency addressing the upcoming monitoring. At this time, the agency director may request a review of any issue (s) not addressed in the attached monitoring instruments. This request must be in writing from the agency director to the WDB Director.

Confirmation: The agency director will receive written or electronic confirmation of the selected date, time, and location for commencement of the review. The same communication will include a request for documents to be provided to the WDB prior to the review (if any) and timelines for submission of such information. If applicable, the communication will confirm the agency director's request for review of any issue (s) outside the scope of the monitoring tools.

Review Team Composition: Where practicable, the WDB monitoring teams will consist of at least two WDB staff members. Local board members and Local Elected Officials may supplement the monitoring team. The WDB reserves the right to alter the configuration of the review team and the review time as deemed necessary and appropriate by the lead WDB review team leader.

Entrance Interview: On-site reviews will commence with an entrance interview between the monitoring team, the agency director or designee and any other local representatives deemed appropriate by the agency. The interview will include:

1. The lead reviewer's introduction of the review team, the scope of the review, and the estimated timeframe for completion;
2. Designation by the agency director or designee of local staff or representatives to serve as points of contact for the issues to be reviewed;
3. Arrangements for review of agency sub-recipients (if applicable); and
4. Questions, comments, or clarifications regarding the review.

The Review: On-site review will utilize, in whole or in part, the attached monitoring tools and other tools, as needed. Other issues regarding the review follow:

1. The review team will review previous reports, audits, etc. prior to commencement of the on-site review, including a review of previous findings and corrective actions (where applicable). A review will be made to determine if previous cited findings have been remedied.
2. During the review, issues that could be cited in a report will be noted to appropriate agency representatives and every possible opportunity given for correction prior to the conclusion of the review. If corrections are made and deemed acceptable, the WDB (at its discretion) may elect to omit the issue from the formal report, or report the issue with a notation that corrective action has already occurred and no further action is needed.
3. The review team will have access to and the right to copy any and all documents or records pertinent to awards of funds made by the WDB or other WIOA-related issues. No original documents will be removed from the review site unless approved by the appropriate local representative or permitted by legal authorization.

Exit Conference: On-site visits will conclude with an exit conference between the review team, the agency director or designee, and any other local representative deemed appropriate by the WDB. The conference will be led by the Team Leader and will include:

1. A review of findings;
2. A review of the timeframe for issuing a formal report on the review; and
3. Questions, comments, or clarifications of the review and its findings.

It should be noted that during the review, at the exit conference, and prior to the issuance of the formal report on the visit, the agency will have the opportunity to offer responses to all findings, including provision of documents as necessary or requested by the WDB. The WDB may conduct additional follow-up visits or utilize other means of review in response to information provided by the agency prior to the issuance of a formal report.

Prior to issuing a formal report, the WDB will not make public any findings without first notifying the agency director. Information regarding the reviews and findings will be made public in accordance with applicable federal, state, and local privacy laws.

Formal Report: The WDB will issue a written formal report regarding comprehensive on-site reviews within 30 calendar days of the date of the exit conference. The report will be addressed to the agency director, or designee. The report will clearly distinguish between *findings* (issues of non-compliance with the Act, its regulations, or other applicable laws or regulations) and *observations* (suggestions or recommendations for process improvement). Those items considered findings may or may not involve issues of costs that are questioned or recommended for disallowance. Findings are subject to corrective actions to be submitted, in writing, to the WDB. Where applicable, the report will provide references to the appropriate statute, regulation, policy, etc. that forms the basis for each finding.

Issue Resolution/Corrective Action: Where costs are questioned or recommended for disallowance, the agency will be notified of the process for addressing the resolution of such issues. Where corrective action is deemed necessary, the agency will be notified of the need to provide a Corrective Action Plan (CAP). The agency will have 30 calendar days from receipt of the CAP notification to submit such a plan. The CAP shall be signed by the agency director or designee, addressed to the WDB Director, and contains at least the following:

1. Document the entire finding as cited in the formal monitoring report;
2. An assessment of the current situation, including any actions already taken to address the problem;
3. A plan describing, in detail, the actions to be taken to correct the problem at issue;
4. A timetable for actions to be taken, including dates by which certain levels of progress will be achieved; and
5. A plan describing how reoccurrence of the cited deficiency will not occur in the future.

WDB staff will review the CAP, with recommendations regarding acceptance or rejection to be made to the WDB Director or other entity charged with acceptance/rejection of such plans. WDB staff will work with the agency and its staff to rectify issues preventing acceptance of the CAP. Upon acceptance of the plan, follow-up will occur as needed to review progress and provide technical assistance toward fulfillment of the CAP. Follow-up may be on-site or by other means as deemed necessary and appropriate by the WDB.

WDB staff will make every effort to work with the agency staff during each of the monitoring process, from scheduling on-site visits to addressing any and all corrective action/issue resolution situations. WDB staff is available to provide technical assistance whenever possible, whether related to monitoring issues or on other WIOA topics. The assistance of WDB staff will therefore be available during the development of CAPs by agencies prior to their submission to the WDB for approval as previously outlined in this policy. Requests for WDB staff technical assistance, outside the range of a formal monitoring, should be submitted in writing to the WDB Director. Staff will provide a briefing with recommendations to the WDB's Performance Measure Committee prior to issuance of a monitoring report to an agency. The committee can make further comments in the report.

Sanctions: In the event of the failure or non-implementation of CAPs during a negotiated timeframe, the WDB staff will make recommendations to the Region VII Workforce Development Board regarding the use of sanctions as permitted by the local WDB, WorkForce West Virginia, or WIOA. In the event sanctions are issued, the agency receiving such sanction will be given an opportunity to appeal the sanctions based on the WDB's

formal grievance policy. Sanctions can include the cancellation of contracts, recapture of funding, repayment of disallowed costs, and debarment from future WIOA activities.

Action: Agencies receiving WIOA funds should take whatever action is necessary to comply with this policy, including but not limited to designing and/or implementing appropriate local monitoring programs and protocols.

This policy should be placed with other policies promulgated by the WDB and/or its predecessors in the binder or other filing mechanism used to maintain an updated collection of local WDB policy issuances.

Equal Opportunity and Grievances: The Region VII Workforce Development Board prohibits discrimination in all aspects of the administration, management, and operation of Workforce Innovation and Opportunity Act programs and activities. Services offered at the Region VII WorkForce WV Career Centers will be provided universally without regard to race, color, religion, sex, national origin, age, disability, or political affiliation or belief. Individuals may file a complaint or grievance by following the Region VII Workforce Development Board Grievance Procedure Policy, a copy of which will be provided upon request.

Questions: Contact the Region VII Workforce Development Board Executive Director, 151 Robert C. Byrd Industrial Park Road, Suite 2, Moorefield, WV 26836. Telephone number is (304) 530-5258. Fax number is (304) 530-5107.

Expiration: Effective until rescinded, in writing, by the Region VII Workforce Development Board.



T.J. Van Meter, Executive Director



Date



Layne Diehl, Chairperson Region VII WDB



Date

REGION VII WORKFORCE DEVELOPMENT BOARD

Fiscal Monitoring and Evaluation Policy

Policy Area: Oversight and Monitoring

Effective Date: June 11, 2026

Reviewed Annually

Approved By: Region VII Workforce Development Board

1. Purpose

The purpose of this policy is to establish the monitoring, oversight, evaluation, and corrective action procedures utilized by the Region VII Workforce Development Board (LWDB) to ensure compliance with the Workforce Innovation and Opportunity Act (WIOA), Uniform Guidance requirements, WorkForce West Virginia policy, and all applicable federal and state laws and regulations.

This policy establishes a risk-based monitoring framework designed to ensure effective stewardship of public funds, accountability for performance outcomes, compliance with administrative and programmatic requirements, protection of participant rights, and continuous improvement of workforce services throughout the Region VII Workforce Development Area.

2. Authority and References

This policy is issued pursuant to the following authorities:

- Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128
- WIOA Section 107(d)(8) – Local Board Oversight Responsibilities
- WIOA Section 184 – Administrative Provisions
- WIOA Section 188 – Nondiscrimination and Equal Opportunity
- 20 CFR §683.410 – Oversight and Monitoring
- 20 CFR §683.420 – Resolution of Findings
- 29 CFR Part 38 – Equal Opportunity and Nondiscrimination
- 2 CFR §200.303 – Internal Controls
- 2 CFR §200.331 – Subrecipient and Contractor Determinations
- 2 CFR §200.332 – Requirements for Pass-Through Entities
- 2 CFR §200.334 – Record Retention
- 2 CFR §200.521 – Management Decision on Audit Findings
- TEGL 23-19 Change 2
- Applicable WorkForce West Virginia monitoring and oversight policies, procedures, technical assistance guidance, and operating instructions.

3. Scope

This policy applies to all Region VII Workforce Development Board staff, fiscal agents, subrecipients, contractors, service providers, one-stop operators, and any entity receiving WIOA Title I funds administered through the Region VII Workforce Development Board.

This policy applies to all WIOA Adult, Dislocated Worker, Youth, statewide initiatives administered locally, and any additional federal workforce grants administered by Region VII. This includes review of service delivery, participant files and outcomes to ensure compliance with WIOA program and contract requirements.

4. Definitions

Subrecipient: A non-federal entity receiving WIOA funds to carry out a programmatic function or service on behalf of the Region VII Workforce Development Board.

Contractor: An entity receiving WIOA funds to provide specific goods or professional services under defined procurement terms and conditions.

Finding: A documented violation of federal law, state policy, local policy, contract requirements, or internal control requirements requiring corrective action.

Concern: An issue or operational weakness that does not currently rise to the level of a formal finding but could result in future noncompliance if not corrected.

Questioned Cost: A cost identified during monitoring for which additional documentation or clarification is required to determine allowability.

Disallowed Cost: A cost determined to be unallowable under federal, state, or local requirements and subject to repayment or recovery.

Corrective Action Plan (CAP): A written response submitted by the monitored entity outlining actions, timelines, and responsible staff for resolving findings.

Risk Assessment: A structured process used to determine the level, scope, and frequency of monitoring based upon identified fiscal, administrative, operational, and performance risk indicators.

5. Entity Classification Requirements

Prior to the execution of any subaward, contract, memorandum of understanding, or provider agreement, the Region VII Workforce Development Board shall conduct and document a case-by-case determination regarding whether the entity is classified as a subrecipient or contractor in accordance with 2 CFR §200.331.

Region VII shall utilize the state-required “Appendix A: Subrecipient vs. Contractor Determination Tool” as part of the official procurement and monitoring record. Existing providers shall be reviewed and classified immediately upon implementation of this policy.

Completed classification determinations shall be maintained alongside procurement records, contracts, monitoring files, and annual monitoring documentation.

6. Annual Monitoring Plan

The Region VII Workforce Development Board shall develop and maintain a written Annual Monitoring Plan for each Program Year.

The Annual Monitoring Plan shall include, at minimum:

1. A complete listing of all monitored entities;
2. Entity designations as subrecipient or contractor;
3. Assigned risk levels;
4. Planned monitoring activities and review types;
5. Estimated monitoring dates or review periods; and
6. Assigned monitoring staff.

The completed Risk Assessment Tool and Subrecipient vs. Contractor Determination Tool shall be maintained as part of the official Annual Monitoring Plan documentation.

The monitoring plan may be revised throughout the year based upon changes in risk, performance deficiencies, complaints, audit findings, staffing changes, procurement actions, or directives issued by WorkForce West Virginia or the U.S. Department of Labor.

7. Risk-Based Monitoring Framework

Region VII shall utilize a risk-based monitoring methodology consistent with state policy and federal oversight requirements.

The Region VII Workforce Development Board shall utilize the state-provided “Subrecipient Risk Assessment Tool and Monitoring Frequency Matrix (Appendix C)” to determine the appropriate scope, depth, and frequency of monitoring activities.

Risk factors may include:

- Prior monitoring findings;
- Fiscal instability;
- Staff turnover;
- Single audit findings;
- Performance deficiencies;
- Timeliness and accuracy of reporting;
- Volume of expenditures;
- Participant complaint history;
- Procurement concerns;
- Internal control weaknesses;
- New provider status; and
- Failure to timely implement corrective actions.

Entities identified as high risk may receive enhanced oversight, additional technical assistance,

increased file sampling, more frequent desk reviews, or additional on-site monitoring visits. Low-risk entities may receive limited scope or desk-based monitoring activities where appropriate.

8. Monitoring Areas and Administrative Domains

Monitoring activities may include, but are not limited to:

- Programmatic compliance reviews;
- Fiscal monitoring;
- Participant file reviews;
- Data validation;
- Internal control assessments;
- Procurement reviews;
- Performance evaluations;
- Equal Opportunity (EO) and ADA compliance;
- Priority of Service compliance;
- Conflict of Interest evaluations;
- Supportive service reviews;
- Training contract reviews;
- Follow-up service reviews;
- Case management documentation reviews;
- Eligibility determinations; and
- Record retention compliance.

Monitoring may occur through:

- On-site reviews;
- Desktop reviews;
- Data system analysis;
- Participant interviews;
- Staff interviews;
- Financial reconciliations;
- Observation of service delivery; and
- Review of policies, procedures, contracts, invoices, and supporting documentation.

9. Contractor Oversight

Contractors shall be monitored separately from subrecipients using procurement and deliverable-based oversight methodologies.

Contractor oversight shall include:

- Verification that procurement actions complied with federal, state, and local procurement standards;
- Review of contract deliverables;
- Review of invoices and unit costs;
- Verification that services were performed in accordance with the Statement of Work (SOW);
- Review of contractor performance measures; and
- Verification of payment accuracy and contract compliance.

Contract monitoring shall focus on contract performance, deliverables, and procurement integrity rather than subrecipient program administration requirements.

10. Monitoring Frequency and Notification

Programmatic, fiscal, and administrative monitoring shall occur no less than annually for subrecipients unless adjusted through the approved risk-based monitoring methodology.

Routine monitoring reviews shall generally require formal written notification no less than fourteen (14) calendar days prior to the commencement of the review. The notification shall include:

- Scope of review;
- Review dates;
- Requested documentation;
- Monitoring staff assigned; and
- Anticipated entrance and exit conference information.

Region VII reserves the right to conduct unannounced or limited notice reviews where fraud, abuse, health and safety concerns, complaints, data integrity concerns, or other significant risks are identified.

11. Data Validation and Participant File Reviews

Region VII shall conduct participant file reviews and data validation activities to ensure:

- Eligibility documentation supports participant enrollment;
- Services are properly documented;
- Case notes accurately reflect service delivery;
- Supportive service documentation is complete;
- Measurable skill gains and credentials are properly documented;
- Exit and follow-up requirements are met; and
- Data entered into the Management Information System (MIS) is accurate, timely, and supported by source documentation.

Data validation findings shall be documented and corrective action shall be tracked through resolution.

12. Fiscal Oversight and Internal Controls

Fiscal monitoring activities shall include evaluation of:

- Allowable costs;
- Cash management procedures;
- Financial reporting;
- Payroll documentation;
- Procurement standards;
- Separation of duties;
- Inventory controls;
- Training expenditures;
- Supportive service payments;

- General ledger reconciliations;
- Audit reports; and
- Internal control systems.

Region VII shall ensure that monitored entities maintain effective internal controls in accordance with 2 CFR §200.303.

13. Questioned and Disallowed Costs

Costs identified during monitoring that lack sufficient supporting documentation or require additional clarification shall initially be classified as Questioned Costs.

Entities shall be provided a reasonable cure period, generally not to exceed thirty (30) calendar days, to provide additional documentation or corrective information.

If the entity fails to adequately resolve the issue within the designated timeframe, the cost may be escalated to a Disallowed Cost and become subject to repayment, recovery, offset, or other administrative action.

Region VII shall consult with WorkForce West Virginia fiscal staff when disallowed costs are identified or when repayment actions may be required.

14. Corrective Action and Resolution

Monitoring reports shall identify findings, concerns, technical assistance recommendations, and required corrective actions.

Entities receiving findings shall submit a written Corrective Action Plan (CAP) within the timeframe established by Region VII, generally not to exceed thirty (30) calendar days from issuance of the monitoring report.

Corrective Action Plans shall include:

- Root cause analysis;
- Specific corrective actions;
- Responsible staff;
- Completion timelines; and
- Documentation supporting resolution.

Region VII shall track all findings through final resolution and may conduct follow-up reviews to verify implementation of corrective actions.

15. Audit Resolution Requirements

Region VII shall issue written management decisions on audit findings no later than six (6) months following acceptance of the audit report in accordance with 2 CFR §200.521.

All audit findings, questioned costs, corrective actions, and resolutions shall be documented and maintained within the official monitoring file.

16. Technical Assistance and Continuous Improvement

Monitoring activities are intended not only to identify deficiencies but also to promote continuous improvement and strengthen local workforce service delivery.

Region VII staff may provide technical assistance, policy clarification, training, corrective guidance, and operational recommendations throughout the monitoring process.

17. Confidentiality and Record Retention

All monitoring records, participant information, financial documents, and investigative materials shall be maintained in accordance with WIOA confidentiality requirements and applicable record retention standards under 2 CFR §200.334.

Monitoring records shall be retained for no less than three (3) years following final closeout of the applicable grant award unless a longer retention period is required due to litigation, audit, investigation, or state directive.

18. Policy Review

This policy shall be reviewed annually and updated as necessary to ensure alignment with federal regulations, WorkForce West Virginia guidance, U.S. Department of Labor directives, and operational best practices.

19. Signatures



T.J. Van Meter, Executive Director

6-11-26
Date



Layne Diehl, Chairperson Region VII WDB

6-11-26
Date

Appendix A - Subrecipient vs. Contractor Determination

Entity
Name: _____

Contract/Subaward Number: _____

Program: _____

Instructions: Federal regulation (2CFR 200.331) requires a case-by-case determination. Check all that apply. No single point here makes the final decision on its own. Your determination should be based on which category describes the relationship best overall.

Subrecipient indicators (check if yes)

- ☐ Determines who is eligible to receive WIOA services
- ☐ Has its performance measured against WIOA primary indicators of performance
- ☐ Has responsibility for programmatic decision-making
- ☐ Is responsible for adherence to applicable WIOA program requirements
- ☐ Uses the Federal funds to carry out a program for public purpose

Contractor Indicators (check if yes)

- ☐ Provides goods or services within normal business operations
- ☐ Provides similar goods or services to many different purchasers
- ☐ Is not subject to WIOA compliance requirements as a result of the agreement (though must still adhere to contract terms)
- ☐ Paid based on deliverables or unit cost

Final Determination (check one)

- ☐ Subrecipient (Subject to full monitoring and Single Audit requirements if over threshold)
- ☐ Contractor (Subject to procurement standards and contract oversight)

Justification Narrative:

Prepared by: _____

Date: _____

Approved by: _____

Date: _____

Appendix B – Annual Monitoring Plan Template

This appendix form shall be utilized as part of Region VII Workforce Development Board monitoring and oversight activities.

Entity Name	Classification	Risk Level	Monitoring Type	Review Period	Assigned Staff	Status/Notes

Appendix C – Risk Assessment Tool and Monitoring Frequency Matrix

This appendix form shall be utilized as part of Region VII Workforce Development Board monitoring and oversight activities.

CONTRACTOR NAME: _____

Score each factor according to the rubric below. Enter the score and justification. Total score determines the risk level.

Risk Factor	Rubric	Score	Comments/Required Action
Prior Monitoring Findings	0=None 1=Minor/resolved 3=Repeated/significant		
Single Audit Results	0=None/Not Required 1=Minor/Non-WIOA 3=WIOA/Material Findings		
Financial Stability	0=Strong 1=Moderate Concerns 3=Unstable		
Staff Capacity/Turnover	0=Stable 1=Moderate Changes 3=High Turnover		
Experiencewith WIOA/Federal Funds	0=3+ years 1=1-3 years 3=New		
Size of Award	0=<250K 1=250K-1M 3=>1M		
Complexity of Services	0=Basic 1=Moderate 2=High Complexity		
Performance Outcomes	0=Meets/Exceeds 1=Slightly Below 3=Significantly Below		

Reporting Accuracy/Timeliness	0=Consistent 1=Occasional issues 3=Frequent issues		
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Total Score: _____

Risk Level:

0-4 = LOW

5-10 = MEDIUM

11+ = HIGH

Final Risk Level: _____

Frequency Level	Desktop Spot Monitoring (Minimum)	On-site/Remote Full Monitoring (Minimum)
LOW	Annually	Annually
MEDIUM	Semiannually	Annually
HIGH	Quarterly	Semiannually

Monitoring Frequency: _____

Reviewer Name: _____

Date: _____

Monitoring Frequency is subject to change depending on previous results

Appendix D – Corrective Action Plan Template

This appendix form shall be utilized as part of Region VII Workforce Development Board monitoring and oversight activities.

Finding	Corrective Action	Responsible Staff	Due Date	Resolution Status

Appendix E – Questioned and Disallowed Cost Log

This appendix form shall be utilized as part of Region VII Workforce Development Board monitoring and oversight activities.

Cost Item	Amount	Questioned/Disallowed	Date Identified	Resolution Status	Notes

