

	POLICY P06: MONITORING
	APPROVED: 10/28/2016 REVISION: 6/26/2020 APPROVED BOARD REVISION: 6/2022 INTERNAL REVIEW CONDUCTED: 6/30/2023
	<input type="checkbox"/> NEW <input checked="" type="checkbox"/> REVISED

PURPOSE

The purpose of this policy is to outline guidance regarding monitoring by Northwest Oregon Works (NOW) for subawards creating an assistance agreement with the intention for subrecipients to carry out or achieve a public purpose.

POLICY

NOW will conduct monitoring of each subaward or fixed cost subaward funded with federal, state, or other funds that require monitoring adherence. NOW will ensure compliance with federal rules and regulations, state and local policies and guidance applicable to such funding. NOW's will conduct all monitoring in partnership with the chief local elected officials (CLEO) including but not limited to planning, performing, findings, remediation action and reporting of all monitoring efforts. In relation to NOW's WIOA federal funding, chief local elected officials will conduct oversight of youth workforce investment activities authorized under WIOA sec. 129(c), adult and dislocated worker employment and training activities under WIOA secs. 134(c) and (d), and the entire one stop delivery system in the local area. This includes, on an annual basis, the physical and programmatic accessibility of all one-stop centers.

Monitoring will be conducted no less frequently than annually nor more frequently than quarterly except in unusual circumstances. CLEO's and subrecipients will be immediately informed of any monitoring endeavors outside of the annual monitoring requirements.

Contracts for the consideration of procurement, service or acquisitions agreement for NOW's own use or benefit, albeit related to a federal or state program, will be excluded from monitoring unless monitoring requirements are required for other reasons. NOW will determine the nature of award instruments in regards contract or sub-award by using NOW's internal assessment guide then documenting that determination.

Subrecipient monitoring processes will include but not limited to the following:

- Monitoring will consist of an on-site review and desk audit.
- NOW will provide subrecipients with a desk review guide and a deadline for completion. The guide will be reviewed by NOW staff who will also schedule an on-site monitoring visit with each subrecipient.

- Monitoring will include review of compliance with NOW contracts, policies, procedures, and guidance; WIOA; applicable administrative rules; and federal and state policies and guidance for each program, function and activity funded with WIOA funds.
- Monitoring will include review of participant records, fiscal records, subrecipient policies and procedures to determine compliance with contract language, deliverables, and applicable federal, state, and local policies.
- The monitoring will result in a monitoring report that will be provided to each subrecipient. The report will cite any areas of concern as observations or findings and provide clear instructions for any corrective action to be taken, as well as timeframes for completion of corrective actions.
- The monitoring report will outline timeframes and processes for any appeal by the subrecipient to NOW in response to the monitoring report. It will also outline timeframes and process for resolution of appeals. The Executive Director of NOW will make the final decision on any appeals.
- A monitoring report or summary will be provided at least annually to the local board, the chief local elected officials, and OWI, along with annual programmatic and accessibility reports conducted to ensure that programs and offices are compliant with EO/ADAs standards.

REFERENCES

20 CFR 679.370

2 CFR 200.331

2 CFR 200.328

Subrecipient Management and Oversight SMART 3.0 Training