Section-05 Compliance	P-0500200	Effective Date: 06/18/2020		
Replaces TU 2018-082018 Program Monitoring Policy dated 08/16/2018				
Martha Webb-Jones, TAWDB Chair				

Monitoring Policy

It is the policy and commitment of the Tulsa Area Workforce Development Board that our programing be compliant with federal, state, and local area policy while ensuring robust programing for the clients we serve and creating outcomes that change the trajectory of a person's life and increase the economic prosperity of the communities we serve.

I. Monitoring

The Tulsa Area Workforce Development Board is committed to a policy of monitoring that is not only focused on the review process to identify weaknesses and areas of non-compliance, but also to provide an opportunity for technical assistance and training, identify best practices, implementing corrective action, and ensuring corrective action is completed. Staff designated by the Tulsa Area Workforce Development Board shall conduct regular and periodic monitoring to determine compliance with federal regulations, state policies, and TAWDB policies as well as procedures. Monitoring activities shall be conducted with such frequency and in such detail, both quantitative and qualitative, to provide reasonable assurance of compliance and effective program operations. Monitoring activities shall include, but are not limited to:

- A. Administrative and Financial Activities
- B. Customer File Reviews
- C. Worksite Interviews
- D. Data Validation
- E. Performance Evaluation

II. Monitoring Schedule

- A. Client files will be reviewed on a monthly basis.
- B. Performance measures will be reviewed on a continual basis.
- C. Client interviews will be conducted on a continual basis. A minimum of 10% of clients will be interviewed in a program year.
- D. Active worksite interviews will be conducted on a continual basis.
- E. All other areas will be reviewed once a program year

EQUAL OPPORTUNITY AND NONDISCRIMINATION: All providers must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity. Auxiliary aids and services are available upon request to individuals with disabilities.

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Reports will be generated from regular monitoring data to present a timely, accurate and appropriate vehicle for staff reporting of program and overall operations efficiencies/deficiencies.

III. Components of Monitoring

- A. Compliance: Compliance may include a review of:
 - 1. Eligibility determination
 - 2. Needs determination
 - Progression towards performance achievement
 - 4. Other areas of service provision
 - 5. Administrative controls
 - 6. Personnel
 - 7. Civil rights & ADA compliance
 - 8. Audit and audit resolution
 - 9. Facilities
- B. Fiscal may include a review of:
 - 1. Review of the payment determination process
 - 2. Source documentation
 - 3. Traceability for all transactions
 - 4. Match and leveraged resources
 - Budget control
 - 6. Cash management
 - 7. Program income
 - 8. Cost allocation
 - Allowable costs
 - 10. Cost classification
 - 11. Financial reporting
 - 12. Training resource management
 - 13. Procurement
 - 14. Equipment
 - 15. Intangible property
 - 16. Sustainability

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- C. Performance may include the review of:
 - 1. Client outcomes information
 - 2. Other factors directly affecting the achievement of Local Area IV negotiated performance standards and other local performance indicators
 - 3. Data validation
 - 4. Other measures as required
- D. Satisfaction may include the review of:
 - Obtaining feedback, data, and outcomes of clients, worksites, partners, and other stakeholders to determine the quality, scope and satisfaction level of services offered and provided.

IV. Action

The Executive Director is responsible for compliance of this policy. The Executive Director is responsible for annual review and revisions if needed. Any exceptions to this policy statement will require prior written approval from the Executive Director or Chair of the Tulsa Area Workforce Development Board.

This policy will be effective immediately upon approval of the TAWDB membership.

Chair, Tulsa Area Workforce Development Board / Date

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