



Area 11: Local Policy

Subrecipient Monitoring Policy

Purpose:

This policy provides guidance regarding local oversight responsibilities for administration of federal and state funding, including Workforce Innovation and Opportunity Act (WIOA) funds. Oversight includes reviewing, monitoring and evaluating WIOA services delivered in Area 11 Columbus-Franklin County. The Workforce Development Board of Central Ohio (WDBCO) will monitor each subrecipient in order to provide reasonable assurance that subrecipients are complying, in all material respects, with laws, regulations, and award provisions applicable to programs which support adults, dislocated workers, and youth participating in WIOA Title I activities.

Background:

A subrecipient means that the provider:

Determines citizen eligibility to receive program benefits by taking all necessary information to determine eligibility;

Has its performance measured against whether the objectives of the federal program are met;

Develops and submits a proposal describing the services it will provide;

Gives written assurances of its responsibility for complying with applicable program requirements; and,

Uses the federal funds to carry out its own program as compared to providing goods and services for a program of the federal government.

Policy:

WDBCO is responsible for continuous monitoring of its contractually funded subrecipients. In addition, WDBCO will formally monitor all subrecipients receiving state or federal funding dollars in accordance with grant requirements on an annual basis for the duration of the contract as required by WIOA Section 183 and OMB 2 CFR Part 200.

WDBCO will ensure that subrecipients are in compliance with state and federal guidance while using federal funds to achieve the outcomes and deliverables of the program under which they are funded. WDBCO will use the following guidance:

- 1) WDBCO has established appropriate systems for procurement, award and monitoring of contracts with subrecipients. The system establishes clear standards of accountability;

- 2) WDBCO develops a contract with an agreed Scope of Work with goals, obligations, and performance measurements in unambiguous terms;
- 3) WDBCO evaluates each subrecipient's risk of non-compliance with federal statutes, regulations, and the terms and conditions incorporated in the contract. Determining risk factors include, but are not limited to:
 - a. Subrecipient's prior experience with similar contracts;
 - b. Results of prior audits and/or monitoring and the extent to which the same or similar contract has been reviewed; and,
 - c. Whether the subrecipient has new personnel or new or substantially changed systems.
- 4) WDBCO will take prompt and appropriate corrective action upon becoming aware of any evidence of violation of WIOA, associated regulations, state provisions, WDBCO policy and/or subrecipient agreement.
- 5) WDBCO establishes the following guidelines for corrective action:
 - a. An observation means that the subrecipient has not implemented a best practice that could lead to violations of policy, regulation or law, and the subrecipient should take steps to implement the steps outlined in the monitoring report.
 - b. A finding means that the subrecipient is required to take a specified corrective action and provide WDBCO with written evidence that the corrective action has been implemented.
 - c. WDBCO reserves the right to end the contract with the subrecipient for nonperformance, noncompliance, or failure to comply with corrective action. In addition, WDBCO may require repayment of funds that are spent in a manner that does not meet program performance, WDBCO policy, state/federal regulation or law.
 - d. If corrective action or fund repayment by the subrecipient is required, such action will result in a loss of points in the competitive scoring for the next procurement for which the subrecipient applies.

References:

WIOA Section 183

[20 CFR § 675.300](#)

[20 CFR § 683.410](#)

20 CFR § 200.330

Code of Federal Regulations OMB 2 CFR Part 200.

Audit Requirements for Federal Awards Final Rule

Training and Employment Guidance Letter, No. 15-14.

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