



**POLICY #:** P-01  
**Quality Assurance and Program Oversight Reviews**

**ISSUED:** May 17, 2018

**PURPOSE:**

To establish Clackamas Workforce Partnership's monitoring system of all subrecipients supported with Workforce Innovation and Opportunity Act (WIOA) funds (including Adult, Dislocated Worker and Youth program services) and other discretionary grant funds.

**REFERENCES:**

- 2 CFR 200.327-332
- WIOA Sections 107(d)(8), 184(d)(2), 185(c)(3)
- 20 CFR Parts 679.370, 683.215

**DEFINITIONS:**

Corrective Action: Plans for improvement are developed in response to program improvement identification, i.e., a finding that is of a compliance nature.

Finding: The identification of an item or issue that is of a significant concern or indicated the violation of a guiding principle or requirement. Prior to identifying a finding, the standard operating procedure is for the Clackamas Workforce Partnership to confer with the subrecipient staff on whether the item or issue was an abnormality/exception.

Observation: The identification of a current item or issue discovered in the course of a review that involves system/procedural problems that need immediate attention, but are not serious and/or material enough to warrant being categorized as a finding. The recommendation would identify whether the subrecipient needs to respond in writing concerning action taken to address the recommendation.

Subrecipient: A legal entity to which a sub award of Federal funds is made and that is accountable to the recipient for the use of the funds provided. A subrecipient determines eligibility for the Federally funded program, has its performance measured against the objectives of the Federal program, has responsibility for programmatic decision-making, and has responsibility for adherence to applicable Federal program compliance requirements.

**POLICY:**

The Clackamas Workforce Partnership will conduct annual reviews of all subrecipients using a monitoring tool that examines all WIOA programmatic and fiscal activities. The monitoring tool will identify documents to be collected from subrecipients for staff review prior to the on-site visit. These documents might include program policies, procedures, and forms which demonstrate compliance with certain requirements and copies of required documents and reports. In addition, a desk-review is intended to inform the on-site review by supporting

information secured by interview activities. The monitoring tool will be provided to the subrecipient at the time the desk review components are requested, generally six weeks prior to the scheduled on-site review. Reviews will test design elements to ensure the subrecipient is providing the full range of services stipulated in the sub grant agreement.

Upon conclusion of the review, a final report will be written and will record commendations, recommendations, observations, and/or findings of the review and documented recommendations and associated timelines for actions to be taken as a result. Any findings not resolved or that are considered serious in nature will result in the establishment of a corrective action plan.

The Clackamas Workforce Partnership's subrecipients must establish and use local internal procedures which, at a minimum, include those sufficient to assure compliance with local, state and federal laws and regulations. These procedures shall include, but are not limited to, periodic on-site review of subrecipients' contracts and subrecipient records pertinent to WIOA participant eligibility and file reviews, performance, expenditure rates against contract and budget, fiscal management, cash management, and prior monitoring/audit issues and status of corrective action. Clackamas Workforce Partnership's subrecipients will maintain documentation including reports and review work papers to attest to the ongoing local review efforts.

**PROCEDURE:**

Clackamas Workforce Partnership will:

1. Coordinate time, place and work sites to be reviewed with the subrecipients.
2. Conduct desk reviews prior to an on-site visit. The desk review may include, but is not limited to, prior audit and monitoring issues and findings, performance and demographic elements, cash draws and/or billings, incident reports, and complaints and grievances.
3. Conduct an on-site entrance conference with the subrecipients to review the monitoring desk-review response and scope of the review.
4. Conduct the on-site review.
5. Conduct an exit conference and review the results. If findings are identified, the subrecipient and Clackamas Workforce Partnership will establish a mutually agreed upon corrective action plan will be developed prior to or during the exit conference.
6. Prepare an initial report.
7. Allow for the subrecipient to respond within the timeframe identified.
8. Prepare a final report.
9. Review follow-up activities with the subrecipient.

Approved:



5-17-15

Clackamas Workforce Partnership Board Chair

Date

