

Policy Area: WV PROWD	
Title: Oversight and Monitoring	Number: PWD-OAM-25-V1
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PURPOSE:

The purpose of this policy is to ensure that subrecipients of the WV PROWD (Partnerships for Reentry Opportunities in Workforce Development) grant operate in full compliance with applicable federal regulations, the terms and conditions of the grant agreement, and are using funds effectively to meet program goals. This procedure applies to all subrecipients receiving funds through the WV PROWD grant, which is a demonstration grant jointly administered by the U.S. Department of Labor (DOL) and the Department of Justice (DOJ).

BACKGROUND:

It is the policy of the WV PROWD program to conduct regular and thorough oversight of all subrecipients to verify adherence to grant requirements, progress toward performance outcomes, and maintenance of sound fiscal and operational practices. Oversight is designed to prevent misuse of funds, identify areas for improvement, and provide technical assistance where needed.

REFERENCES:

- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)
- WV Grant Agreement Requirements

SUBRECIPIENT AGREEMENT:

- Each subrecipient must have a fully executed grant agreement that clearly outlines:
 - Scope of work
 - Budget and allowable costs
 - Reporting requirements
 - Performance metrics
 - Roles and responsibilities

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MONITORING AND REPORTING REQUIREMENTS:

- **Financial Monitoring**
 - Subrecipients must submit monthly or quarterly financial reports, including:
 - Expenditure details
 - Budget-to-actual comparisons
 - Documentation for high-value or questioned costs
 - WorkForce West Virginia (WFWV) will review all reports for:
 - Allowability of costs under Uniform Guidance
 - Alignment with approved budget
 - Timeliness and completeness
- **Programmatic Monitoring**
 - WFWV will regularly assess subrecipients' performance through:
 - Written progress reports (e.g., monthly, quarterly)
 - Participant outcome data (e.g., enrollments, completions, job placements)
 - On-site or virtual monitoring reviews
- **Performance Reviews**
 - Formal reviews will occur annually, encompassing both:
 - Financial performance
 - Programmatic effectiveness
 - Reviews will be documented and may include recommendations or technical assistance.

SITE VISITS:

- WFW may conduct periodic site visits (announced or unannounced) to:
 - Observe service delivery
 - Verify reported activities
 - Evaluate case file documentation, peer mentoring interactions, and delivery of supportive services
- Each site visit will be documented using standardized checklists, field notes, and follow-up action items.

CORRECTIVE ACTIONS:

- When compliance or performance issues are identified, WFWV will initiate a progressive corrective action process designed to support resolution while maintaining accountability.
 - **Step 1: Informal Resolution**

CLOSEOUT PROCEDURES:

- Before final closeout, WFWV will conduct a comprehensive review of the subrecipient's:
 - Final financial and programmatic reports
 - Achievement of performance outcomes
 - Resolution of any outstanding issues
- Upon satisfactory completion, WFWV will issue a formal closeout certification.

ONGOING COMPLIANCE AND TECHNICAL ASSISTANCE:

- WFWV is responsible for ensuring subrecipient compliance by:
 - Conducting regular file reviews, including participant records and case notes
 - Reviewing service delivery documentation for peer mentoring, supportive services, and reentry activities
 - Providing technical assistance and capacity-building support to address deficiencies and improve service quality