

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
  - o 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

- o 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.
  - **o** Step 1: Informal Resolution

■ WFWV will first attempt to resolve minor issues through informal means, such as technical assistance, clarification of expectations, or verbal/written communication with the subrecipient. These efforts will be documented internally.

# • Step 2: Formal Notification and Corrective Action Plan (CAP)

- If the issue is not resolved informally or is of a more serious nature, WFWV will issue a written notification of findings, outlining:
  - The specific deficiencies or noncompliance,
    - Required corrective actions,
    - Applicable citations or contract provisions,
    - A request for a CAP.
- The CAP must:
  - Address each finding individually;
  - Outline specific steps for resolution;
  - Provide reasonable timelines for correction;
  - Identify the personnel responsible for implementation.
  - Submitted to WFWV within the designated timeframe stated in the notification (typically within 30 days).

### Step 3: Monitoring and Escalation

■ WFWV will monitor the implementation of the CAP through follow-up documentation, site visits, or progress reports. If deficiencies are not corrected within the approved timeframe, or if additional concerns arise, WFWV may escalate enforcement actions.

### Step 4: Sanctions

- If corrective actions remain incomplete or issues persist, WFWV may impose sanctions, which may include:
  - Temporary withholding of payments;
  - Imposition of additional oversight or reporting requirements;
  - Reduction or reallocation of funding;
  - Suspension or termination of the subrecipient agreement.
- All sanctions will be commensurate with the severity, duration, and recurrence of the issue and will follow federal due process requirements.

### **RECORD KEEPING:**

- WFWV will maintain all subrecipient oversight records—including reports, communications, and site visit documentation—for five years after the grant closeout.
- Subrecipients must retain and make available all supporting documentation for external audits or reviews by federal, state, or independent auditors.

### **CLOSEOUT PROCEDURES:**

- Before final closeout, WFWV will conduct a comprehensive review of the subrecipient's:
  - o 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:
  - o 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