

Workforce Connections WIOA Fiscal Monitoring Tool

Program Year: 2016

Provider Name:	Date(s) of Review:	
Contract(s) Name:	Reviewer Names:	

PRIOR MONITORING REVIEW

Describe any findings or improvements identified during the most recent review that may require follow-up.

Review Date: _____

ADMINISTRATIVE REQUIREMENTS

1. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Has the Sub-recipient properly retained prior year's agreement records and files? Yes _____ No _____

Reviewer Note: Review record retention procedure. WIOA requires that records be maintained for a period of no less than three years from the date of submission of the final grant expenditure report; these records need not be retained on premises.
Citation: WC Contract Provision 20.

2. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient adequately evaluate and monitor its own programs to safeguard against non-compliance, fraud and abuse? Yes _____ No _____

Does the Sub-recipient ensure that employees and the public are made aware of NV DETR policy #5.2 Fraud & Abuse?

Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire and verify, if applicable.
Citation: WC Contract Attachment B 34. and C 21., NV DETR Policy 5.2

3. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient acknowledge WC as grantor of funds on all information disseminated to the public?

Yes _____ No _____

Does the Sub-recipient list the required EEO language on all recruiting materials?

Yes _____ No _____

Reviewer Note: Review information disseminated to the public, does it have WC Logo? Does it include EEO language?

Citation: WC Contract Provision 6.

4. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient ensure that employees do not reproduce, provide, disclose, or give access to confidential information to any third party, or to any other employee not having a legitimate need to know any such information and data? Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire.

Citation: WC Contract Provision 45. and Attachment B 29.

5. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient ensure that safeguards are in place to prohibit employees from using their position for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain? Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire.

Citation: WC Contract Provision 4.

6. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Has the Sub-recipient completed background checks on all candidates for employment or current employees not previously background checked? Yes _____ No _____

Reviewer Note: Request a printout of all background checks performed and cross check with employees.

Citation: WC Contract Provision 51.

7. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient have General Public Liability Insurance and is the minimum required coverage in effect? Yes _____ No _____

Is WC listed as an additional insured? Yes _____ No _____

If the Sub-recipient utilizes motor vehicles in carrying out agreement activities, is the minimum required coverage in effect? Yes _____ No _____

If the Sub-recipient utilize work experiences and/or internships, does the Sub-recipient maintain Workers' Compensation insurance for each work experience/internship client? Yes _____ No _____

For youth contracts, does the Sub-recipient maintain Sexual Misconduct Insurance? Yes _____ No _____

Is WC listed as an additional insured? Yes _____ No _____

Reviewer Note: Minimum required coverage for General Liability Insurance is \$1,000,000 single limit and \$2,000,000 aggregate coverage. Minimum required coverage for motor vehicles is \$1,000,000 per occurrence for "non-owned", "hired" and corporate vehicles, if applicable. If no workers' compensation insurance, how does the Sub-recipient ensure coverage for the participant? Sexual misconduct insurance is not normally included in general liability insurance. Ensure that this coverage is expressly stated. Citation: WC Contract Provision 11.

8. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Has the Sub-recipient submitted a copy of their last independent audit to WC accounting staff?

Yes _____ No _____

Was it submitted on time? Yes _____ No _____

Reviewer Note: If audit report has not been reviewed, review it on-site. Audit reports must be submitted within 30 days of the audit report date, or 9 months from sub-recipient's year end, whichever is sooner.

Citation: WC Contract Attachment C 19.

9. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient have adequate separation of duties? Yes _____ No _____

Reviewer Note: Review policies and procedures. Request current authorized signature list and the segregation of duties worksheet.

Citation: WC Contract Attachment C 1.

10. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Is the Sub-recipient's SAM Registration (formerly CCR) current? Yes _____ No _____

Reviewer Note: Check SAM.gov to ensure registration is active.

Citation: Circular 2003-016, FAR case 2002-018

FINANCIAL MANAGEMENT AND CONTROLS

11. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient maintain adequate written policies and procedures? Yes _____ No _____

Reviewer Note: Request required policies and procedures listed below. Policies and procedures must be written, reflect WC requirements, and policies/procedures may be combined if appropriate. Policy = a guideline that regulates organizational activities (the “what” and the “why”); Procedure = a description of the normal method for handling things, protocol, steps (the “how-to”). Citation: 2 CFR 200, WC Contract Attachment C 1.

Written policies required by 2 CFR 200:

- | | |
|--|--|
| <input type="checkbox"/> Payments 200.305 | <input type="checkbox"/> Compensation 200.430 |
| <input type="checkbox"/> Procurement 200.318 | <input type="checkbox"/> Fringe Benefits 200.431 |
| <input type="checkbox"/> Competition 200.319 | <input type="checkbox"/> Employee Relocation Costs 200.464 |
| <input type="checkbox"/> Method for Evaluation and Selection 200.320 | <input type="checkbox"/> Travel Costs 200.474 |
| <input type="checkbox"/> Allowable Costs 200.302 | |

Minimum written procedures required by WC for effective internal controls (200.303):

- | | |
|--|---|
| <input type="checkbox"/> Receivables | <input type="checkbox"/> Credit card, if applicable |
| <input type="checkbox"/> Payables | <input type="checkbox"/> Bank reconciliation and uncleared checks |
| <input type="checkbox"/> Approvals | <input type="checkbox"/> Program income and interest income |
| <input type="checkbox"/> Documentation | <input type="checkbox"/> Indirect costs |
| <input type="checkbox"/> Record retention | <input type="checkbox"/> Incident reporting |
| <input type="checkbox"/> Reporting (financial and/or program) | <input type="checkbox"/> Internal controls/segregation of duties |
| <input type="checkbox"/> Participant/program services (including supportive service and incentives, if applicable) | |
| <input type="checkbox"/> Cost distribution (shared costs) | |
| <input type="checkbox"/> Safeguarding of checks and cash equivalents (bus passes, gift cards, gas cards, blank vouchers) | |

12. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Did Sub-recipient have any program income during the contract year? Yes _____ No _____

Does the Sub-recipient properly account for program income? Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire. Review program income procedure. Review organization income statement to see if anything should have been classified as program income to WIOA. Citation: WC Contract Attachment C 12.

13. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient's accounting system provide for a level of detail that allows for identification of costs and chargeability to the WIOA program? Yes _____ No _____

If Sub-recipient has multiple WIOA contracts or funding sources, is the Sub-recipient tracking them separately? Yes _____ No _____

Does source documentation clearly identify the amount charged to WC contracts for shared costs? Yes _____ No _____

Reviewer Note: Vouchers, receipts, timesheets and all other payments must be identifiable as WIOA costs; track a voucher/payment and timesheet to confirm that source documentation identifies account, amount and WIOA program charged.
Citation: WC Contract Attachment C 1. and C 3.

14. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Has the Sub-recipient received any refunds or rebates? Yes _____ No _____

If yes, does the Sub-recipient properly handle refunds and rebates? Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire.
Citation: WC Contract Attachment C 13.

BUDGETING

15. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Based on the Sub-recipient's budget, are actual expenditures consistent with the amount of time that has elapsed under the contract? Yes _____ No _____

If not, is there a plan in place to address this? Yes _____ No _____

Reviewer Note: Divide number of months elapsed as of latest invoice submitted by number of total months in contract to get percentage elapsed. Multiply total contract amount by percentage. Is this amount within 10% of the total year to date expended as of latest invoice submitted? If not, is there a sufficient plan in place to address this?
Citation: WC Contract Attachment C 1.

16. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient have a way to ensure that the organization is not exceeding budgeted amounts?

Yes _____ No _____

Reviewer Note: Request documentation regarding budget tracking. This should also include other budgetary requirements, i.e. Training % for Adult Contracts and WBL requirements for Youth Contracts.
Citation: WC Contract Attachment C 2.

CASH MANAGEMENT

17. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient have sufficient unrestricted resources or stand-in costs to cover unallowable costs?

Yes ___ No ___

Are unrestricted resources and/or stand-in costs tracked as they are incurred? Yes _____ No _____

Reviewer Note: Reviewer should request documentation regarding unrestricted resources and stand-in costs.

Citation: WC Contract Attachment C 7. and C 22.

18. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient advance funds? Yes _____ No _____

If yes, is advanced cash expended in a timely manner? Yes _____ No _____

Reviewer Note: Review contract worksheet. Have advanced funds been expended within 30 days from payment? Are funds being expended under correct subcategories (i.e., if advanced Adult funds, were Adult funds expended?).

Citation: WC Contract Attachment C 1. and C 3.

19. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Is Sub-recipient billing on an accrual basis? Yes _____ No _____

If yes, is Sub-recipient liquidating accruals in a timely manner? Yes _____ No _____

Reviewer Note: Review accounts payable aging, is there anything outstanding for more than 30 days? Have there been any complaints made throughout the year by vendors not receiving payment?

Citation: WC Contract Attachment C 1. and C 3.

20. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient reconcile bank accounts monthly and in a timely manner? Yes _____ No _____

Does the Sub-recipient properly handle un-cleared checks according to their procedure? Yes _____ No _____

Reviewer Note: Bank reconciliations should be completed monthly as close to the month end as possible. Review procedures regarding bank reconciliations and un-cleared checks.

Citation: WC Contract Attachment C 1.

PROCUREMENT

21. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient possess WIOA purchased or loaned equipment? Yes _____ No _____
If so, is it safeguarded, properly identified and used for authorized purposes? Yes _____ No _____
Is a current asset and supply listing maintained on WC required template? Yes _____ No _____
Was WC approval obtained for purchases over \$1,000.00? Yes _____ No _____
Was WC and DETR approval obtained for purchases over \$5,000.00? Yes _____ No _____

Reviewer Note: The Inventory Lists will be required to make this determination. Asset inventory must contain all WC red tagged items. Supply list must contain items with a useful life of 2 years and a cost of \$200.00 or more. Choose assets/supplies to verify existence, condition, and if the equipment is being used for WIOA activities. If the Sub-recipient charges more than 50% of any indirect or allocated direct expense to WC sub-awards, prior approval must be obtained by WC prior to purchasing goods with a total unit or system cost over \$1,000 regardless of the actual amount charged to WC. Sub-recipients may only charge capital purchases of \$5,000 or over directly to WC sub awards in full.

Citation: WC Contract Attachment C 16. and WC Policy 2.5

22. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does Sub-recipient utilize subcontracts for services? Yes _____ No _____
Have they been preapproved if over \$1,000.00 for contract period? Yes _____ No _____
Are payments in compliance with the contract? Yes _____ No _____

Reviewer Note: Review any contracts provided. If the Sub-recipient charges more than 50% of any indirect or allocated direct expense to WC sub-awards, prior approval must be obtained by WC prior to entering into contracts for services over \$1,000, regardless of the actual amount charged to WC.

Citation: WC Contract Attachment C 15. and WC Policy ADM-010-06

23. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does Sub-recipient have sub-contracts that meet the Sub-recipient requirements? Yes _____ No _____
If yes, does Sub-recipient perform periodic evaluations to ensure contract scope and spending targets are met?
Yes _____ No _____

If yes, has Sub-recipient conducted a formal monitoring, or is one scheduled? Yes _____ No _____

Reviewer Note: Review monitoring and evaluation reports.

Citation: 2 CFR 200.328 and 200.331

24. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Was prior authorization for voucher systems submitted to WC no later than 60 days after the start of the sub-award period? Yes _____ No _____

Was a procurement action conducted if required by WC, prior to utilizing a voucher system? Yes _____ No _____

Reviewer Note: Request list of vouchers used by sub-recipient and review approval submitted by WC. When reviewing supportive services cross reference any vouchers given out to list provided.

Citation: Admin-010-06

25. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Do payments to any one contactor total \$3,000 or more in the contract period? Yes _____ No _____

If yes, was procurement submitted to WC for prior approval? Yes _____ No _____

Reviewer Note: Review GL detail and add all payments to the same vendor for the period.

Citation: Admin-010-06

26. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Were any sole source purchases made? Yes _____ No _____

Is justification for this purchase method maintained in Sub-recipient files in accordance with WC's policy?

Yes _____ No _____

Reviewer Note: Review policies and procedures pertaining to procurement. Partner and sole source procurements must be properly documented and approved by WC prior to execution.

Citation: WC Contract Attachment C 14.

INDIRECT COSTS AND COST DISTRIBUTION

27. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient have an approved indirect cost rate, or using the de Minimis rate? Yes _____ No _____

Is Sub-recipient accurately pooling indirect costs? Yes _____ No _____

Reviewer Note: Review indirect cost procedure. Request Sub-recipient indirect cost rate documentation and test expenses billed from the indirect pools.

Citation: WC Contract Attachment C 11.

28. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient either direct charge all costs or use a clear and viable cost distribution method to allocate shared direct costs? Yes _____ No _____

Reviewer Note: Review cost distribution procedure and test distribution methodology for invoiced expenses.

Citation: WC Contract Attachment C 10.

REPORTING AND INVOICING

29. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Are the quarterly financial status reports submitted by the due date? Yes _____ No _____

Are they accurate? Yes _____ No _____

Reviewer Note: Review reporting procedure. Review FSR reports, ensure backup agrees with reports submitted and matches WC numbers. If no obligations or accruals are reported, written documentation must be retained in the backup regarding the reason why.

Citation: WC Contract Attachment C 18. and WC Policy FIS-020-04

30. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Has the Sub-recipient submitted requests for payment by the required due date, or requested any extensions prior to the due date? Yes _____ No _____

Do current invoice amounts consistently tie to current GL report? Yes _____ No _____

Are year to date amounts reported consistently accurate? Yes _____ No _____

Reviewer Note: Review the contract worksheet for invoice submission dates. Have there been any ongoing invoicing issues?

Citation: WC Contract Attachment C 3.

ALLOWABLE COSTS AND SOURCE DOCUMENTATION

31. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

For training activities does the Sub-recipient ensure funds will be returned or de-obligated if a participant does not complete training? Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire. Sub-recipient must have a sufficient system to notify WC when participants drop out of training.

Citation: WC Policy ADW-030-06

32. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

When utilizing OCCs, does the file review indicate compliance with the WC guidelines? Yes _____ No _____
Reviewer Note: Review Sub-recipient's program procedures. Select participant files from Sub-recipient's tab of WC Training Tracking sheet. Test for allowability and source documentation. See WC policy for more information.
Citation: WC Policy ADW-030-06

33. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

When utilizing OJTs, does the file review indicate compliance with the WC guidelines? Yes _____ No _____
Reviewer Note: Review Sub-recipient's program procedures. Select participant files from Sub-recipient's tab of WC Training Tracking sheet. Test for allowability and source documentation. Funded OJT must be for a specified period; no more than 50% of wages can be subsidized unless a waiver is in effect; holiday pay is allowable; benefits are not allowable; overtime is not allowable; invoice backup must include an invoice, fully signed timesheets for dates within the OJT contract, and proof of payment to participant. OJTs not allowed at political entities. See WC policy for more information.
Citation: WC Policy ADW-030-07

34. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

When utilizing WEXs, does the file review indicate compliance with the WC guidelines? Yes _____ No _____
Reviewer Note: Review Sub-recipient's program procedures. Select participant files from Sub-recipient's supportive service tab of invoice. WEX must be for a specified period; Sub-recipients can pay either wages or a stipend and, must have a contract/worksites agreement, and a fully signed timesheets for dates within contract. WEXs not allowed at political entities.
Citation: WC Policy YTH-040-08

35. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

If supportive services have been provided, were they provided within the Sub-recipient's written supportive service policy? Yes _____ No _____
Do participant payments meet the test of "reasonable, necessary and allowable"? Yes _____ No _____
Reviewer Note: Review Sub-recipient's program procedures. Select participant files from Sub-recipient's supportive service detail tab of invoice.
Citation: WC Policies ADW-030-09 and YTH-040-06

36. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Are overhead costs considered reasonable, necessary, allowable, and allocable? Yes _____ No _____

Reviewer Note: To be reasonable, the costs must be at levels no greater than fair market value for the good or service; to be necessary, there must be a clear connection between the WIOA costs and successful operation of contract activities; to be allowable, costs must not be listed as unallowable by OMB circulars of the General Provisions and Assurances or WC contract; to be allocable, the costs must clearly be attributable to the WIOA program. Review detailed contract to date Income Statement for potential unallowable costs.

Citation: WC Contract Attachment C 6.

37. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Is rent/lease being paid with WIOA funds on any facilities? Yes _____ No _____

If rent is being charged to WC, is the Sub-recipient actually utilizing the space represented by the rental charge?

Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire. If rent is being charged, ensure that the facility is not owned by a related third party or under a sale/leaseback situation. Tour facility space charged to WC. Review 2 CFR 200.465 about handling 3rd party & sale/leaseback situations, if applicable.

Citation: 2 CFR 200.446 and 200.465

38. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Is depreciation is being charged to WC? Yes _____ No _____

If yes, is the Sub-recipient utilizing the space represented by the depreciation charge? Yes _____ No _____

Were federal funds used in the purchase or construction of property owned by Sub-recipient?

Yes _____ No _____

If yes, has the Sub-recipient properly excluded that portion from the depreciation calculation billable to WC?

Yes _____ No _____

Reviewer Note: Review response on monitoring questionnaire. Tour facility space charged to WC. Depreciation for any portion of a building constructed or purchased using federal funds is not allowable to be charged to WIOA. Also, an owned facility cannot be amortized in an amount that exceeds the life of the building (usually 50 years) or the federal government will have equity in the building and the owner will have to pay that equity to the federal government when it's sold.

Citation: 2 CFR 200.436

PAYROLL

39. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Is any Sub-recipient compensation exceeding Executive level II rates? Yes _____ No _____

Reviewer Note: Refer to TEGL 5-06 for detailed explanation. In short, \$183,300 is the maximum a person can be paid with WIOA funds in 2015 and \$185,100 for 2016, or the % of impacted funds. For example, if 25% of their time is charged to WIOA, then no more than 25% of the \$183,300 or \$185,100 can be charged to the contract during the year. This amount changes annually, see OPM web site for federal salaries & wages at www.opm.gov. Citation: WC Contract Attachment C 9.

40. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient pay employees in a manner that is acceptable and allowable under WIOA regulations and WC contract? Yes _____ No _____

Reviewer Note: Review compensation and fringe benefit policies/procedures. Test at least one month's wages from an invoice to ensure that wages are properly billed and all source documentation is properly maintained. No bonuses allowed. Do timesheets appear to reflect hours worked and not budgeted amounts? Signatures by both employee and supervisor. No white out. Interview employees regarding how they fill out their timesheet. Citation: WC Contract Attachment C 1., C 3. and C 8.

41. Promising Practice Nothing Noted Needs Improvement
 Finding Observation

Does the Sub-recipient properly bill fringe benefits? Yes _____ No _____

Reviewer Note: Review compensation and fringe benefit policies/procedures. Test at least one month's fringe benefits from an invoice to ensure that fringe benefits are properly billed and all source documentation is properly maintained. Fringe benefit percentages billed should mirror within reason the percent of wages billed. No bonuses allowed. Citation: WC Contract Attachment C 1., C 3. and C 8.
