NORTEC
POLICY STATEMENT
WIOA PROGRAM MONITORING

Last Updated: July 10, 2025

GENERAL INFORMATION

The NoRTEC Administrative Entity (NoRTEC AE) will monitor its WIOA Service Providers semi-annually. Monitoring will be conducted through on-site and desk reviews and will be done for the purpose of assisting each Service Provider to comply with applicable federal, state, and NoRTEC requirements.

All actions related to monitoring observations or findings will take place within a reasonable amount of time, and the NoRTEC will request corrective action as needed. Disputes arising from the monitoring process will be resolved by NoRTEC's Executive Committee.

The NoRTEC AE will routinely provide a report on the status of monitoring activities, findings, requested corrective action, and resolution of findings at regularly scheduled NoRTEC Workforce Development Board/Governing Board meetings.

ON-SITE REVIEWS

Each Service Provider will be visited up to twice each program year by the NoRTEC AE for a programmatic review. The Service Providers will also be visited up to twice each program year by the NoRTEC AE for a fiscal review. The programmatic and fiscal reviews may be conducted jointly or separately, based on the availability of NoRTEC and Service Provider staff.

The on-site monitoring process will include a review of relevant materials and documents, as well as staff and participant interviews as necessary. The review may include on-site visits to worksites to interview both participants and their supervisors to review relevant records and documents.

An exit conference will be conducted that will outline any findings, areas of concern or observations. A written letter of findings and any request for corrective action will be sent to the Executive Director and the Board Chair of the Service Provider within a reasonable amount of time following the on-site visit. The Service Provider will be required to provide documentation of corrective action taken within the guidelines specified in the written monitoring letter. If no findings and/or observations are determined, a written letter will be issued to the Executive Director and the Board Chair of the Service Provider within 30 days of the review that reflects the successful review.

DESK REVIEWS

NoRTEC will review Service Provider fiscal and participant data monthly. The data will be reviewed for:

- Timeliness of submission

- Internal consistency and accuracy
- Conformance to contractual elements
- Conformance to performance objectives
- Any other criteria the NoRTEC AE considers relevant

The NoRTEC AE will request and review any other fiscal or program related materials necessary to ensure compliance with NoRTEC policy and applicable federal and state requirements.

SERVICE PROVIDERS

Each Service Provider will develop and implement its own fiscal and programmatic review policies and procedures for on-site and desk reviews to be made available at any time for review by NoRTEC AE.

DEFINITIONS

Area of Concern or Observation – If an effectiveness indicator is not met and the reviewer believes that it may possibly result in a finding at some later point if not addressed, an area of concern or observation is identified. Areas of concern or observation are not specific compliance violations, but may negatively impact the program or could lead to a finding in the future. A corrective action may not be specified or required for an area of concern or observation, but may include suggestions for improvement.

Corrective Action Plan (CAP) – A list of specific steps that subrecipients must take within a stated period of time in order to achieve compliance.

Finding – A violation of a specific compliance requirement contained in laws, regulations, federal or state policies, Uniform Guidance, DOL Exceptions, grant terms and conditions, Employment and Training Administration (ETA) policy guidance, including Training and Employment Guidance Letters (TEGL), and/or the grant agreements that requires specific corrective action. Findings are also known as, but not limited to, non-compliance issues, questioned costs, and/or disallowed costs.

Monitoring – The monitoring review is an oversight activity that may lead to opportunities for technical assistance and/or corrective action. For NoRTEC's purpose, a monitoring review is a process used to measure progress, identify areas of compliance, offer opportunities for technical assistance to help resolve non-compliance issues, and ensure that federal funds are used responsibly.

WIOA Administrative Entity, NoRTEC – a unit of local government, corporation, or agency designated by a Chief Elected Official (CEO) to oversee and administer WIOA programs and activities in the Local Area. (20 CFR 678.400)