

Region VI Workforce Development Board 17 Middletown Road White Hall, WV 26554	Classification: One-Stop Operator Monitoring
	Approval Date: June 11, 2026

Approved by: Region VI WDB

Review by Date: June 11, 2031

Region VI Guidance Letter No. 37-25, R-1

PURPOSE: The purpose of this policy is to establish how the Region VI Workforce Development Board (WDB) conducts program monitoring of its One-Stop Operator contractor funded under the Workforce Innovation and Opportunity Act (WIOA) Title I (Adult, Dislocated Worker, Youth). Monitoring will ensure that WIOA and Region VI WDB contract requirements are met. Monitoring a WIOA One-Stop Operator is a critical function of a Local Workforce Development Board to ensure the regional service delivery system is integrated, effective, and compliant with federal regulations.

BACKGROUND: The Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128, requires states and local workforce development boards to ensure effective oversight and monitoring of all employment and training programs funded under Title I. Monitoring is an essential management function that helps verify that sub-recipients deliver services consistent with approved plans, maintain compliance with all applicable laws, regulations, and policies, and achieve intended program results and outcomes. The U.S. Department of Labor (DOL) mandates that recipients of WIOA Title I funds conduct regular monitoring of contractors to ensure accountability for performance and regulatory compliance (20 CFR § 683.410). The Uniform Administrative Requirements at 2 CFR Part 200 required pass-through entities, including LWDB's to monitor the activities of subrecipients and contractors to ensure that federal awards are used for authorized purposes and in accordance with applicable laws, regulations, and the terms and conditions of the award. Federal regulations require that monitoring be conducted using a risk-based approach, which evaluates the level of risk associated with each subrecipient or contractor and adjusts the scope and frequency of oversight accordingly.

NOTE: Fiscal monitoring guidance is addressed in the "Programmatic & Fiscal Monitoring Policy referenced as Guidance Letter No. 8-15, R-2.

REFERENCES:

- Public Law 113-128
- 20 CFR 683.410
- 20 CFR 678.400
- 20 CFR 678.620
- WIOA Title 1 Section 121 (d)
- TEGL 16-16

WIOA One-Stop Operator Monitoring: Review of One-Stop Operator duties and responsibilities under WIOA and Region VI WDB contract requirements.

POLICY: The Region VI Workforce Development Board has established a policy to ensure compliance with the provisions of Title I WIOA by conducting monitoring reviews to sub-recipients contracted through a Request for Proposal process and who have subsequently entered into a contract with Region VI Workforce Development Board. Each subrecipient and/or contractor must receive at a minimum, annual documented

oversight. Prior to the execution of any subaward or contract and before monitoring, all entities will be classified as subrecipients or contractors in accordance with 2 CFR §200.331 by utilizing the State's Subrecipient vs Contractor Determination Checklist. (attached) Written documentation of the determination will be maintained for auditing purposes.

Additionally, Region VI WDB will utilize a documented risk assessment tool to determine the frequency, scope, and method of oversight for each subrecipient and contractor. (attached)

Subrecipient Management and Monitoring Requirements (2 CFR §200.332)

1. Subaward Setup and Required Conditions: Issue subawards that clearly identify all required federal award information (e.g., FAIN, period of performance) and communicate all applicable compliance requirements, internal controls, and record access rights.

2. Risk Evaluation (Pre-award and Ongoing): Evaluate each subrecipient's risk of noncompliance prior to issuance and periodically throughout the award. Apply special conditions or enhanced oversight for higher-risk entities.

3. Monitoring Activities (Minimum Required Elements): Conduct formal reviews (desk, remote, or on-site) at least annually to verify:

- **Cost Allowability:** Ensuring expenses are necessary, reasonable, and allocable.
- **Data Integrity:** Validating participant files against the Management Information System (MIS).
- **Programmatic Compliance:** Verifying eligibility determinations and the delivery of required services.

4. Corrective Action and Follow-Up: Follow up on all identified deficiencies to ensure timely and appropriate corrective action. Validate the correction of findings and document their formal closure.

5. Audit and Resolution Responsibilities: Verify that subrecipients meet Single Audit requirements. Review audit reports and issue a written management decision for any WIOA-related findings within six months of report issuance.

One-Stop Operator Monitoring Frequency:

Staff of the Region VI Workforce Development Board will perform program monitoring at a minimum of annually of subrecipients managing the One Stop Operator contract to ensure compliance with federal, state, and regional rules and regulations.

One Stop Operator monitoring must include, at a minimum:

- Program Coordination, including MOU/IFA Compliance
- Resource Management and Referral Process
- Outreach, Recruitment, and Marketing, including Stevens Amendment Compliance

- Partner Cross-Training and Continuous Improvement
- Reporting Accuracy
- ADA/Equal Opportunity compliance
- Record Retention & Confidentiality

One-Stop Operator Monitoring Process:

1. Subrecipients or contractors, their supervisor, director, and WDB staff are notified by email at least 2 weeks before the monitoring, advising them of the process and aspects of the program monitoring, including a copy of the monitoring tool to be used. (One Stop Operator Monitoring Tool attached)
2. WDB staff conducting monitoring will meet with the contracted staff once the review commences to address any questions and allow an opportunity to produce any missing documentation.
3. A report outlining the results of the program monitoring is sent to the subrecipient or contractor within 30 days of the monitoring date, detailing issues found and resulting corrective action (if applicable).
4. The contractor has 30 days to respond with a corrective action plan (if required) or address any concerns as a result of the report.
5. Region VI WDB staff will issue a final report validating the correction of findings (if any) and documenting the final closure. If deficiencies persist, a follow-up request for documentation may be initiated, giving the contractor at least 30 days to respond.
6. Technical Assistance will be given by WDB staff to the contracted staff if needed to bring them into compliance with WIOA and Region VI WDB policies.

RECORD RETENTION:

Region VI WDB, their subrecipients, and contractors will retain monitoring documentation and related records consistent with:

- 2 CFR § 200.334
- State retention requirements
- WIOA recordkeeping requirements

ACTION: The Region VI Workforce Development Board will make all stakeholders in the Region VI Workforce area aware of this policy.

A copy of this policy can be obtained from The Region VI Workforce Development Board.

EXPIRATION

DATE: Effective until June 11, 2031, or until rescinded or modified by the Region VI Workforce Development Board and Local Elected Officials Board.

Attachments:

Subrecipient vs Contractor Determination Checklist
 Subrecipient Risk Assessment Tool and Monitoring Frequency Matrix
 One-Stop Operator Monitoring Tool

Subrecipient vs Contractor Determination

Entity Name: _____

Contract/Subaward Number: _____

Program: _____

Instructions: Federal regulation (2CFR 200.331) requires a case-by-case determination. Check all that apply. No single point here makes the final decision on its own. Your determination should be based on which category describes the relationship best overall.

Subrecipient Indicators (check if yes)

- ☐ Determines who is eligible to receive WIOA services
- ☐ Has its performance measured against WIOA primary indicators of performance
- ☐ Has responsibility for programmatic decision-making
- ☐ Is responsible for adherence to applicable WIOA program requirements
- ☐ Use the Federal funds to carry out a program for public purpose

Contractor Indicators (check if yes)

- ☐ Provides goods or services within normal business operations
- ☐ Provides similar goods or services to many different purchasers
- ☐ Is not subject to WIOA compliance requirements as a result of the agreement (though must still adhere to contract terms)
- ☐ Paid based on deliverables or unit cost

Final Determination (check one)

- ☐ Subrecipient (Subject to full monitoring and Single Audit requirements if over threshold)
- ☐ Contractor (Subject to procurement standards and contract oversight)

Justification Narrative:

Prepared by: _____ Date: _____

Approved by: _____ Date: _____

SUBRECIPIENT RISK ASSESSMENT TOOL AND MONITORING FREQUENCY MATRIX

CONTRACTOR NAME _____

Score each factor according to the rubric below. Enter the score and justification. Total score determines the risk level.

RISK FACTOR	RUBRIC	SCORE	NOTES/JUSTIFICATION
Prior Monitoring Findings	0=None 1=Minor resolved 3=Repeated/significant		
Single Audit Results	0=None/Not Required 1=Minor/non-WIOA 3=WIOA/material findings		
Financial Stability	0=Strong 1=Moderate concerns 3=Unstable		
Staff Capacity/Turnover	0=Stable 1=Moderate Changes 3=High turnover		
Experience with WIOA/Federal Funds	0=3+ years 1=1-3 years 3=New		
Size of Award	0=<250K 1=250k-1M 2=>1M		
Complexity of Services	0=Basic 1=Moderate 2=High Complexity		
Performance Outcomes	0=Meets/Exceeds 1=Slightly below 3=Significantly below		

Reporting Accuracy/ Timeliness	0=Consistent 1=Occasional issues 3=Frequent issues		

Total Score _____

Risk Level:

0-4 = Low

5-10 = Medium

11+ = High

Final Risk Level: _____

Frequency Level	Desktop Spot Monitoring (minimum)	On-Site/Remote Full Monitoring (minimum)
Low	Annually	Annually
Medium	Semiannually	Annually
High	Quarterly	Semiannually

Monitoring Frequency: _____

Reviewer Name: _____ **Date:** _____

ONE-STOP OPERATOR MONITORING TOOL (WIOA)

Contractor:	
Monitored By:	Date Monitored:

Program Coordination

- ☐ MOU/IFA is currently in place with Partner signatures (review MOU/IFA agreement)
- ☐ Infrastructure (IFA) contributions are monitored by the One Stop Operator (review last quarter invoices)
- ☐ The One Stop Operator maintains ongoing communication with partner agencies to ensure a coordinated approach and clear point of contact for services provided through the American Job Center. Explain how this is accomplished: _____

- ☐ One Stop Operating Manual is up to date at a minimum of annually (review the manual)
- ☐ OSO is convening partner meetings with all partners at a minimum of quarterly. (review minutes from meetings)
- ☐ Are partners following the Region VI AJC Partner Network Service Delivery Model: The Customer Journey, ensuring a customer-centered service delivery. (review process)

Monitor Comments / Observations:

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Resource Management and Referral Process

- ☐ Partner Resource Binder is current (review resource binder) Date: _____ should be updated annually
- ☐ Customer Flow – Needs Assessment/ Intake Forms used for triaging customers. (review intake form) – Interview at least one partner on the usage of intake assessment form.

ONE-STOP OPERATOR MONITORING TOOL (WIOA)

☐ Do all customers have access to available resources without eligibility requirements, ie. Computer stations, referrals to other partners, etc.

☐ Referral System – Is there a documented, functional referral process between partners? (review the form/process)

Monitor Comments / Observations:

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Outreach, Recruitment, and Marketing, including Stevens Amendment Compliance

☐ Is the American Job Center (AJC) branding visible and consistent across all partner areas?

☐ What types of outreach are used to reach customers in rural areas of the region? List Examples:

☐ One Stop Operator visits outlying Affiliate sites at a minimum quarterly?

☐ All marketing, recruitment, and outreach materials in the American Job Centers and Mobile units comply with the Stevens Amendment guidance, if applicable? (Review materials within the AJC center)

☐ Are websites and social media platforms compliant with the Steven Amendment guidance?

☐ Are partner brochures strategically placed in specialized locations to reach those in need, i.e. Homeless shelters, housing agencies, day report centers, etc.? (list some regional examples)

☐ Is One Stop Operator assisting in the coordination of regional Rapid Response activities and serving as the Region VI WDB representative to those activities.

Monitor Comments / Observations:

ONE-STOP OPERATOR MONITORING TOOL (WIOA)

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Cross Training, Continuous Improvement

☐ Has the One Stop Operator conducted at least two cross-training sessions for partner staff this program year? List name of training sessions: _____

☐ Is customer feedback collected regularly to support continuous improvement efforts? Explain how and review most current quarter of customer surveys (QR code or paper)

Monitor Comments / Observations:

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Reporting Accuracy

☐ Are the customer satisfaction form results tracked/reported to Partner Network and Region VI WDB? How often? _____

☐ Are monthly One Stop Operator Activity reports submitted in a timely fashion to the Region VI WDB with sufficient detail to show contract performance progress? (Review at least 2 months' reports)

Monitor Comments / Observations:

ONE-STOP OPERATOR MONITORING TOOL (WIOA)

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Equal Opportunity & Accessibility

☐ All facilities and digital tools are maintained in accordance with the Americans with Disabilities Act (ADA) to ensure accessibility for individuals with disabilities. (Review current certification.)

☐ Equal opportunity posters and policies are visible to the public, customers, and partners.

☐ Complaint procedures available

☐ Language Assistance is available to support effective communication with all customers.

☐ Program accessibility compliant – Are assistive technology tools available and are staff trained to use them? (screen readers, transcribing equipment, etc) Explain how assistive technology is addressed within the AJC _____

☐ Does the One Stop Operator offer annual Equal Opportunity Training to partners? If not, how is EO training addressed?

Monitor Comments / Observations:

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Record Retention & Confidentiality

☐ Are AJC & WIOA customer files stored securely?

☐ Is confidential information protected and is confidentially addressed in the Partner MOU?

☐ Are records kept in accordance with state and federal retention requirements?

Monitor Comments / Observations:

ONE-STOP OPERATOR MONITORING TOOL (WIOA)

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Disclosures & Firewalls

- ☐ Has the One Stop Operator filed a current Conflict of Interest disclosure with the Region VI WDB – disclosing any potential conflicts regarding relationships with other training or service providers?
- ☐ Does the One Stop Operator remain uninvolved in the procurement of other service providers?
- ☐ Was the One Stop Operator selected through a competitive process? Date of last RFP _____
- ☐ The One Stop Operator **DOES NOT** perform oversight of itself or negotiate its own local performance accountability measures.

Monitor Comments / Observations:

TECHNICAL ASSISTANCE NEEDED IN THIS CATEGORY YES _____ NO _____

Monitor's Signature: _____ Date: _____