



WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

Rev. 2

EFFECTIVE DATE: September 14, 2026

SUBJECT: Monitoring Policy

I. PURPOSE

This policy sets requirements for monitoring and oversight of Workforce Innovation and Opportunity Act (WIOA) Title I programs administered by the Northern Area Local Workforce Development Board (NALWDB). It establishes standards to ensure compliance with federal and state laws, regulations, guidance, grant requirements, and Board policies, while promoting accountability, integrity, consistency, and continuous improvement in the workforce delivery system.

Monitoring is a key internal control that ensures WIOA funds are administered according to requirements, participant eligibility and services are documented, expenditures are allowable and supported, performance outcomes are accurately reported, and public funds are protected from fraud, waste, abuse, and mismanagement.

The Board views monitoring as both a compliance and technical assistance function. These activities identify strengths, improve program quality, provide technical assistance, promote consistent implementation of WIOA requirements, and support timely corrective action when deficiencies are found.

Monitoring activities shall be conducted using the official electronic participant file maintained in NMJOBS in accordance with NALWDB Electronic File Policy No. 9, Rev. 1. Nothing in this policy limits the Board's authority to conduct additional monitoring, request supporting documentation, or perform reviews necessary to ensure compliance with applicable federal, state, or local requirements.

II. SCOPE

This policy applies to all Workforce Innovation and Opportunity Act (WIOA) Title I programs administered by or on behalf of the Northern Area Local Workforce Development Board (NALWDB), including Adult, Dislocated Worker, and Youth programs, as well as all workforce services and activities funded in whole or in part with WIOA Title I funds.

This policy applies to all Board staff, service providers, subrecipients, contractors, training providers, fiscal agents, and any other entity responsible for administering, delivering, managing, or supporting WIOA Title I services within the Northern Area Local Workforce Development Area.

Monitoring activities conducted under this policy include programmatic reviews of participant eligibility, service delivery, case management, work-based learning activities, supportive services, performance accountability, fiscal



documentation, contract compliance, data integrity, and other administrative functions necessary to ensure compliance with applicable federal and state requirements.

All monitoring activities shall use the official electronic participant file maintained in NMJOBS in accordance with NALWDB Electronic File Policy No. 9, Rev. 1. Additional supporting documentation may be requested as needed to verify compliance with applicable federal, state, local, contractual, or programmatic requirements.

Nothing in this policy limits the Northern Area Local Workforce Development Board's authority to conduct announced or unannounced monitoring, desk reviews, on-site reviews, technical assistance visits, fiscal reviews, follow-up monitoring, or other oversight activities necessary to fulfill its responsibilities under WIOA.

III. AUTHORITY

This policy is issued under the authority of, and shall be administered in accordance with, the following federal and state laws, regulations, guidance, and Board policies, as amended:

Workforce Innovation and Opportunity Act (WIOA)

- Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, including but not limited to:
 - Section 116 – Performance Accountability
 - Section 121 – Local Workforce Development System
 - Section 122 – Eligible Training Providers
 - Section 129 – Youth Workforce Investment Activities
 - Section 134 – Adult and Dislocated Worker Employment and Training Activities
 - Section 181 – Labor Standards
 - Section 184 – Fiscal Controls; Sanctions
 - Section 185 – Reports, Recordkeeping, and Investigations
 - Section 188 – Nondiscrimination and Equal Opportunity

Code of Federal Regulations

- 20 CFR Part 680 – Adult and Dislocated Worker Activities under Title I of WIOA
- 20 CFR Part 681 – Youth Activities under Title I of WIOA
- 20 CFR Part 683 – Administrative Provisions under Title I of WIOA, including but not limited to:
 - §§ 683.400–683.440 – Monitoring and Oversight
 - § 683.410 – Responsibilities of Local Workforce Development Boards



- § 683.420 – Resolution of Findings and Corrective Actions

Uniform Administrative Requirements

- 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, including:
 - § 200.302 – Financial Management
 - § 200.303 – Internal Controls
 - § 200.334 – Record Retention

Federal Guidance

- Applicable Training and Employment Guidance Letters (TEGLs) issued by the U.S. Department of Labor, Employment and Training Administration.
- Applicable Training and Employment Notices (TENs), as issued.

State Guidance

- Applicable New Mexico Department of Workforce Solutions (NMDWS) Policy Issuances, Guidance Letters, Technical Assistance Guides, and Monitoring Requirements.

Local Policy

- NALWDB Electronic File Policy No. 9, Rev. 1.
- All other applicable Northern Area Local Workforce Development Board policies governing WIOA Title I programs.

IV. DEFINITIONS

For purposes of this policy, the following definitions apply:

Board:

The Northern Area Local Workforce Development Board (NALWDB).

Corrective Action

A documented process implemented to resolve findings or deficiencies identified through monitoring, audits, or reviews. Corrective actions shall identify the deficiency, required corrective measures, responsible party, and completion timeframe.

Desk Review:

A review of participant, fiscal, contractual, or administrative documentation conducted remotely using the official electronic file, reports, or other supporting documentation to determine compliance with applicable federal, state, and local government requirements.

Electronic File:



The official participant record maintained in the New Mexico Department of Workforce Solutions Management Information System (NM Jobs), as governed by the NALWDB Electronic File Policy No. 9 Rev. 1.

Finding

A documented instance of noncompliance identified through monitoring or oversight activities where a federal or state law, regulation, grant requirement, contract provision, or Board policy has not been met.

Findings shall be classified as follows:

Minor Finding – An administrative or documentation deficiency that does not affect participant eligibility, allowability of costs, program integrity, or performance outcomes.

Major Finding – A significant deficiency that may affect participant eligibility, allowable costs, program compliance, fiscal integrity, or performance outcomes.

Critical Finding – A serious or systemic violation involving significant noncompliance, questioned or disallowed costs, fraud, waste, abuse, conflict of interest, or other deficiencies requiring immediate corrective action.

Monitoring

An ongoing process used to evaluate compliance with applicable federal and state laws, regulations, grant requirements, Board policies, contracts, and program requirements through desk reviews, on-site reviews, technical assistance, fiscal reviews, and other oversight activities.

Observation

A condition identified during monitoring that does not constitute a finding but represents a potential compliance risk, process weakness, or opportunity for improvement.

Program Monitor

The individual designated by the Northern Area Local Workforce Development Board to conduct monitoring activities, provide technical assistance, document findings, and verify corrective actions.

Service Provider

Any entity under contract or agreement with the Northern Area Local Workforce Development Board to administer or deliver Workforce Innovation and Opportunity Act (WIOA) Title I services.

Subrecipient

A non-federal entity that receives WIOA Title I funds from the Northern Area Local Workforce Development Board to carry out part of a federal award in accordance with 2 CFR Part 200.

Technical Assistance

Guidance, training, consultation, or other support provided to improve compliance, strengthen program operations, and promote continuous improvement.

V. ROLES AND RESPONSIBILITIES

A. Northern Area Local Workforce Development Board

The Northern Area Local Workforce Development Board (NALWDB) is responsible for establishing monitoring policies and procedures, overseeing Workforce Innovation and Opportunity Act (WIOA) Title I programs, and maintaining an effective system of internal controls to promote compliance with applicable federal, state, and local requirements.

B. Executive Director



The Executive Director is responsible for implementing the Board's monitoring system and providing administrative oversight of monitoring activities. The Executive Director shall review monitoring results, ensure appropriate corrective actions are implemented, provide direction regarding compliance issues, and support continuous program improvement.

C. Program Monitor

The Program Monitor is responsible for conducting monitoring activities in accordance with this policy and applicable federal, state, and local requirements. Responsibilities include, but are not limited to:

- Conducting desk reviews and on-site monitoring as appropriate.
- Reviewing participant eligibility, case documentation, fiscal documentation, contracts, performance data, and program activities.
- Identifying findings, observations, and areas requiring corrective action.
- Providing technical assistance to service providers and Board staff.
- Preparing monitoring reports and documenting monitoring activities.
- Verifying implementation of corrective actions.
- Reporting significant or systemic compliance concerns to Board management.

D. Service Providers and Subrecipients

Service providers and subrecipients must administer WIOA programs in accordance with applicable federal and state laws, regulations, grant requirements, contractual obligations, and Board policies.

Service providers shall:

- Maintain complete, accurate, and timely documentation in the official electronic participant file in accordance with NALWDB Electronic File Policy No. 9, Rev. 1.
- Cooperate with monitoring activities and provide access to records, documentation, personnel, and facilities as requested.
- Respond to monitoring findings within established timeframes.
- Implement corrective actions necessary to resolve identified deficiencies.
- Maintain appropriate internal controls to ensure ongoing compliance.

E. Program Staff

Program staff must maintain accurate participant records, document services provided, comply with applicable program requirements, and support monitoring activities by providing complete, timely documentation.

VI. MONITORING STANDARDS



The Northern Area Local Workforce Development Board (NALWDB) shall conduct monitoring activities to evaluate compliance with applicable federal and state laws, regulations, grant requirements, contracts, and Board policies governing Workforce Innovation and Opportunity Act (WIOA) Title I programs.

Monitoring activities may include desk reviews, on-site reviews, fiscal reviews, participant file reviews, contract compliance reviews, data validation, technical assistance, and follow-up reviews, as the Board determines appropriate.

Monitoring activities shall evaluate, as applicable:

- Participant eligibility and documentation.
- Case management and service delivery.
- Individual Employment Plans (IEPs), Individual Service Strategies (ISSs), and career planning documentation.
- Work-based learning activities, including On-the-Job Training (OJT), Transitional Jobs (TJT), Work Experience (WEX), and other allowable activities.
- Individual Training Accounts (ITAs) and training services.
- Supportive services and needs-related payments.
- Performance outcomes and data integrity.
- Fiscal management and allowability of costs.
- Contract compliance.
- Maintenance of the official electronic participant file in accordance with NALWDB Electronic File Policy No. 9, Rev. 1.
- Compliance with applicable equal opportunity and nondiscrimination requirements.

Monitoring shall use a risk-based approach that considers factors including, but not limited to, program performance, fiscal accountability, previous monitoring results, identified compliance risks, technical assistance needs, complaints, audit findings, changes in personnel, and other factors the Board determines are relevant.

Nothing in this policy prohibits the Board from conducting additional monitoring activities as needed to ensure compliance, safeguard public funds, protect participant interests, or address identified risks.

VII. MONITORING REPORTS AND DOCUMENTATION

Monitoring activities shall be documented in sufficient detail to demonstrate the scope of the review conducted, the records examined, the compliance requirements evaluated, and the conclusions reached.

Monitoring reports shall accurately identify findings, observations, areas requiring technical assistance, and any recommended corrective actions. Reports shall include sufficient documentation to support all conclusions and shall be maintained in accordance with applicable federal and state record retention requirements.



When findings are identified, monitoring reports shall clearly describe:

- The applicable requirement.
- The condition identified.
- The basis for the finding.
- The required corrective action, when applicable.
- The timeframe for response and resolution.

The Board shall maintain monitoring documentation as part of its official monitoring records and make it available to authorized federal, state, or local oversight entities upon request.

Nothing in this policy limits the Board's authority to conduct follow-up monitoring or request additional documentation necessary to verify compliance.

VIII. FINDINGS, CORRECTIVE ACTIONS, AND RESOLUTION

Monitoring activities that identify instances of noncompliance shall result in documented findings or observations, as appropriate, in accordance with this policy.

Observations shall identify opportunities for improvement or potential compliance concerns that do not constitute a violation of applicable requirements but warrant corrective attention or technical assistance.

Findings shall identify violations of applicable federal or state laws, regulations, grant requirements, contractual obligations, or Board policies and shall be supported by sufficient documentation.

When the Board identifies findings, it shall issue a written monitoring report describing the deficiency, the applicable requirement, the required corrective action, and the response timeframe.

Service providers and subrecipients shall submit a written response and, when required, a Corrective Action Plan (CAP) addressing each finding within the timeframe the Board establishes.

Corrective Action Plans shall include:

- The corrective actions to be implemented.
- The individual(s) responsible for implementation.
- The anticipated completion date.
- Any supporting documentation necessary to demonstrate compliance.

The Board shall review submitted corrective actions and may require additional documentation, technical assistance, or follow-up monitoring to verify implementation.



Monitoring findings shall remain open until the Board determines that all required corrective actions have been satisfactorily completed and documented.

Failure to implement corrective actions or repeated instances of noncompliance may result in additional monitoring, technical assistance, contract actions, reimbursement restrictions, or other remedies authorized under applicable federal, state, or local requirements.

Nothing in this policy limits the Board's authority to conduct follow-up reviews or additional monitoring necessary to verify compliance or safeguard public funds.

IX. RECORD RETENTION

The Northern Area Local Workforce Development Board (NALWDB), service providers, subrecipients, contractors, and other entities administering Workforce Innovation and Opportunity Act (WIOA) Title I funds shall maintain monitoring records in accordance with applicable federal and state record retention requirements.

Monitoring reports, supporting documentation, corrective action plans, correspondence, follow-up reviews, and related monitoring records shall be maintained in accordance with 2 CFR § 200.334, applicable WIOA requirements, New Mexico Department of Workforce Solutions (NMDWS) policy, and Board record retention requirements.

Monitoring records shall be maintained in a manner that protects the confidentiality of participant information while ensuring records are accessible to authorized federal, state, and local oversight agencies upon request.

Nothing in this policy supersedes any longer record retention period required by federal or state law, litigation hold, audit resolution, or grant requirements.

X. TECHNICAL ASSISTANCE AND CONTINUOUS IMPROVEMENT

The Northern Area Local Workforce Development Board (NALWDB) recognizes that monitoring is intended to promote compliance, strengthen program administration, improve service delivery, and support continuous improvement throughout the workforce development system.

The Board may provide technical assistance before, during, or after monitoring activities to help service providers, subrecipients, contractors, employers, and Board staff understand and comply with applicable federal and state laws, regulations, grant requirements, contractual obligations, and Board policies.

Technical assistance may include, but is not limited to:

- Individual consultation.
- Written guidance.
- Training and technical assistance sessions.



- Policy clarification.
- Corrective action support.
- Best practice recommendations.
- Follow-up assistance to improve program performance and compliance.

Technical assistance does not relieve any entity of its responsibility to comply with applicable federal and state requirements, contractual obligations, or Board policies.

The Board shall use monitoring results, technical assistance activities, audit results, performance outcomes, and other oversight information to identify trends, strengthen internal controls, improve program effectiveness, and support continuous quality improvement.

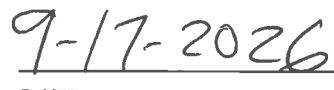
XI. POLICY INTERPRETATION, ADMINISTRATION, EFFECTIVE DATE, AND REVIEW

The Executive Director, or designee, shall be responsible for the administration and interpretation of this policy. Direct questions about applying or implementing this policy to the Executive Director or designee.

This policy shall become effective upon approval by the Northern Area Local Workforce Development Board and shall remain in effect until modified, rescinded, or superseded by subsequent Board action.

This policy shall be reviewed periodically and revised as necessary to ensure continued compliance with applicable federal and state laws, regulations, guidance, and the operational needs of the Northern Area Local Workforce Development Board.


BOARD CHAIR


DATE

