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WIOA BULLETIN NO. 10-17, Change 1

TO: WIOA Partners
FROM: Maricar Pilotin-Freitas, Administrator
Workforce Development Division
SUBJECT: Policy on Oversight and Monitoring

PURPOSE

This bulletin communicates updated oversight and monitoring requirements for entities receiving funds under Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014 from the State of Hawaii. This Change 1 revises 2 Code of Federal Regulations (CFR) Part 200 to reflect revisions by the Office of Management and Budget that were effective August 13, 2020 and November 12, 2020. Change 1 also adds the requirement that annual monitoring must be conducted no later than during the third quarter of the program year and monitoring reports, monitoring responses and corrective action plans must be submitted to the Workforce Development Division (WDD).

BACKGROUND

All entities will comply with the requirements listed below:

- A. Title 2 of the CFR Parts 200.302, 200.303, 200.327, 200.329, 200.331, 200.332, 200.334, 200.337, and Subpart F–Audit Requirements.¹
- B. Title I of the WIOA of 2014, Section 184.

¹ 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards was revised effective November 12, 2020; except for amendments to 200.16 and 200.340 which were effective August 13, 2020.

- C. 20 CFR Chapter V, Subpart D—Oversight and Resolution of Findings,
Parts 683.400-683.440

POLICY

- A. Each subrecipient/subgrantee is responsible for oversight of the operations of each WIOA supported program, function and activity to ensure compliance with applicable federal and State regulations and policies and to assure performance expectations are being achieved in accordance with agreements/contracts. Oversight and monitoring is to be accomplished as listed below:
1. Regular oversight shall be conducted to routinely review program and financial reports submitted by subgrantees/contractors;
 2. Annual on-site program and financial monitoring reviews shall be conducted for each subgrantee or contractor providing program services;
 3. The Annual on-site program and financial monitoring reviews shall be conducted no later than during the third quarter of the program year; and
 4. Annual reviews shall be conducted of subgrantees' audit reports to ensure compliance with 2 CFR Part 200, Subpart F and to follow-up on any deficiencies related to WIOA to ensure corrective action is taken.
- B. A copy of all monitoring reports transmitted to subgrantees/contractors must also be transmitted to the WDD; a copy of all monitoring responses and corrective action plans received by the subrecipient must be submitted to the WDD within 30 days of their receipt.

GUIDELINES

- A. Each subrecipient must perform oversight and monitoring of its WIOA subgrantees and contractors to ensure the following:
1. The subgrant/contract is being used for authorized purposes;
 2. The expenses and activities comply with federal and State regulations and policies;
 3. The expenses have been made against the proper cost categories and within the cost limitations specified in WIOA regulations;
 4. The activities are in accordance with the terms and conditions of the subgrant/contract; and
 5. The performance and financial data are reported accurately and on a timely basis.

- B. Any deficiencies detected during on-site monitoring reviews should be documented and reported to the subgrantee/contractor on a timely basis.
- C. Monitoring deficiencies shall be tracked to ensure timely resolution and corrective action.
- D. Any deficiencies pertaining to WIOA as noted in a subrecipient/subgrantee's audit report requires follow-up to ensure timely resolution and corrective action.

EFFECTIVE DATE:

This policy on Oversight and Management is effective immediately.

REFERENCES

- 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and the USDOL exceptions at 2 CFR Part 2900
- Title I of the WIOA of 2014
- 20 CFR Part 683

INQUIRIES

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