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**BUREAU OF EMPLOYMENT SERVICES  
 POLICY AND PROCEDURES**

<b>ISSUANCE DATE:</b>	<b>April 12, 2017</b>
<b>POLICY NUMBER:</b>	<b>06-05</b>
<b>RECISSION:</b>	

**To:** Local Board Directors

**From:** **Melanie Arsenault**, Director  
 Bureau of Employment Services

**CC:** CareerCenter Distribution  
 Service Provider Directors  
 BRS Director  
**BES Commerce Center-Augusta**

**Subject:** Oversight and Monitoring Responsibilities for Chief Local Elected Officials (CLEO) and Local Workforce Investment Boards (LWIB)

**BACKGROUND:**

The requirements of the LWIB and CLEO (or its designated fiscal agent) to conduct oversight and monitoring as outlined above were established by the WIA legislation and became effective with the implementation of the Act.

Section 117(d)(4) of the Workforce Investment Act (WIA) requires the Local Board, in partnership with the CLEO (or the CLEO's designated fiscal agent) to conduct oversight of the WIA programs and the One-Stop delivery system in the local area. Title 20 CFR Section 667.4(c)(1) requires that recipients and sub-recipients must continuously monitor grant-supported activities in accordance with the uniform administrative requirements at Title 29 CFR Parts 95 and 97, as applicable.

Title 20 CFR Section 667.410(a) requires that each recipient and sub-recipient must conduct regular oversight and monitoring of its WIA activities and those of its sub-recipients. The purpose of this requirement is to ensure that expenditures meet the programmatic, performance, cost category and cost limitation requirements of WIA and the regulations; to determine that there is compliance

with other provisions of the WIA regulations and other applicable laws and regulations; and to ensure that technical assistance is provided as needed.

**POLICY:**

The purpose of this policy issuance is to communicate clarifying guidance on the roles and responsibilities of the Chief Local Elected Official (CLEO) and the Local Workforce Investment Board (LWIB) in conducting financial, program and performance oversight and monitoring in local workforce areas; to explain an important change in the scope of oversight and monitoring activities to be conducted by staff of the Division of Administrative and Financial Services (DAFS) and Bureau of Employment Services (BES) within the Maine Department of Labor (MDOL); to emphasize that performance and accountability are key elements of an LWIA's effective oversight and monitoring plan; and to prescribe the scope and minimum frequency of reviews of an acceptable oversight and monitoring plan.

As of **July 1, of each program year**, the LWIBs must have systems and procedures in place to ensure that they will conduct oversight and monitoring of all their sub-recipients in accordance with the WIA rules and regulations. It will be the role of BES to ensure that the LWIBs are properly meeting oversight and monitoring responsibilities. The BES will directly monitor and conduct oversight of the LWIB as well as review the LWIB's procedures for conducting oversight and monitoring of its sub-recipients.

The scope and the frequency of the oversight and monitoring will include fiscal, program, and performance and accountability.

The fiscal areas will include:

1. Sub recipient monitoring (annual),
2. Financial management/cost allocation (annual),
3. Desk reviews of monthly expenditure reports (monthly)
4. Sub recipient contract reviews (annual).

The program areas will include:

1. WIA IB adult (annual),
2. WIA IB dislocated worker (annual),
3. WIA IB youth (annual),
4. Sub recipient contract reviews (quarterly).

The performance and accountability areas will include:

1. WIA IB performance measures (quarterly),

2. Registrant service levels (quarterly),
3. Registrant activity levels (quarterly), exit strategy (quarterly)
4. Analysis of the relationship between expenditures and program activities
5. Analysis of skill training related to entered employment (quarterly).

*NOTE: The frequencies stated above are minimum levels.*

**POLICY ACTION:**

Attached to this document is the monitoring guide and instruments that have been developed by BES staff for the LWIBs to use as they carry out their monitoring responsibilities. The LWIBs will be required to use the guide and instruments or, alternatively, incorporate the elements of the guide and instruments into their own work products. As BES carries out its role of providing direct oversight and monitoring of the LWIB and CLEO (or its designated fiscal agent) in each local area staff will be available to provide technical assistance and support to local monitoring process as is necessary.

**Attached: Federal Program Monitoring Manual for PY '05-'06**

**DIRECT INQUIRES TO:**

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January 1, 2006

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