

WIOA MONITORING POLICY TABLE OF CONTENTS

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100 GENERAL POLICY

101 Introduction to General Policy

This section describes general monitoring policy considerations overlaying WIOA fiscal, program, and ETPL monitoring. Non-Discrimination and Equal Opportunity (EO) monitoring is to be included in program and ETPL monitoring. ETPL Monitoring is divided into ETPL Subsequent Eligibility Review, which the State requires ETPL coordinators to perform each year to ensure that Training Providers remain eligible, and ETPL monitoring, which ensures compliance with all applicable laws, regulations, policies, and contract provisions.

The County of Monterey WDB shall conduct fiscal, program, and ETPL monitoring in compliance with federal and state regulations governing the final rule of the WIOA, including any subsequent rules. At a minimum, fiscal, program, and ETPL monitoring shall ensure that:

- Services are provided in accordance with federal, state, and local laws, regulations, and policies, including ADA, non-discrimination, worksite environment, personnel practices, record keeping, inventory and other WIOA program requirements.
- Performance outcomes are met as defined in the contract scope of work.
- Service providers' costs classification, inventory, revenue tracking, accounts payable, payroll, and costs allocation system are consistent with Generally Accepted Accounting Principles (GAAP).
- Program participants are receiving quality services in accordance with the contract's scope of work and are satisfied with the services and the delivery system.
- Adequate levels of internal control been established to ensure that performance and programmatic goals are being met.

102 Ongoing Service Provider Performance Monitoring

Management information systems (MIS) reports track program performance results on an ongoing basis to compare planned vs actual performance in order to determine progress toward program goals and objectives and to identify existing or emerging problems. Each month WDB Executive Director meets with service provider to discuss the planned vs actual enrollments. WDB Executive Director will contact the service provider to determine the reasons for the deviation and suggest corrective action or provide technical assistance as necessary.

200 POLICIES FOR ALL TYPES OF ANNUAL MONITORING

201 Monitoring File

A monitoring file or binder shall contain all documentation, communication, and reports for each service provider fiscal or program (including EO), and ETPL monitoring.

202 Annual Monitoring Schedule

The WDB shall establish an annual monitoring schedule for all WDB service providers. The WDB Director shall establish the start dates for fiscal, program monitoring. The timing for the ETPL subsequent eligibility review can vary and is at the discretion of the State ETPL compliance division. Monitoring site visits to ETPL providers occur between April and August.

203 Scheduling of the On-site Monitoring visit/review

203.1 Notice of Intent to Monitor

The WDB shall send a letter (Notice of Intent to Monitor) to the director of the service provider which will indicate the date and time of the monitoring. The letter will indicate the elements of the monitoring visit detailed below in section 205 below, "The On-site Monitoring Visit/Review" and include a list of documentation required prior to or at the time of the monitoring visit and copies of any forms or questionnaires to be completed prior to or used during monitoring.

Please see the sections for each type of monitoring for the specific forms and documentation required. The letter shall also request arrangements for on-site workspace for the monitor to review records and conduct confidential interviews with participants/staff, provide information on the time frames for the on-site visit, and note any translation support required for interviews with non-English-speaking participants. The letter additionally shall provide a timetable for the publication of the draft monitoring report, date by which the service provider may respond to the draft report, timeframe for the WDB staff's response to the service provider's response, date by which the draft report would become final and the date by which the report will be submitted to the WDB for approval.

204 The Desk Review

Prior to any on-site visit staff shall conduct a desk review which may include reviewing MIS files, the contract's scope of work and cost figures, service provider correspondence, the monitoring report from the last review and any other files deemed necessary for a thorough review. WDB regulations state that the monitor has a right to review any documents and/or records related to any WIOA-funded contract or agreement.

Monitors are obligated protect participant confidentiality, and in cases where additional documentation must be sent from the service provider to the monitor for review the monitor shall provide clear time frames for submission and return of such documentation and shall exercise care to see that the documents are properly safeguarded.

If the desk review identifies potential areas of non-compliance or other deficiencies, or if it appears that a corrective action recommended in a prior monitoring report has not been taken effectively, the monitoring staff shall contact the service provider fiscal and/or program staff to target those specific areas for the on-site visit, the interviews and the entrance interview.

205 The On-site Monitoring Visit/Review

The on-site monitoring visit shall consist of an entrance conference with the provider's director/site manager to discuss the purpose and scope of the monitoring, interviews with appropriate staff in order to complete the WDB financial, administrative and contract-specific questionnaires, review of applicable documentation, and may also include interviews with a randomly-selected sample of participants, and observation of the service provider's operations including training programs, workshops, worksite, and administrative workspace to access programmatic aspects of the service delivery and management systems of the program. Participant interviews may be conducted outside of the monitoring site visit by telephone. During the initial discussion with the director/site manager, the monitor should give an estimate of the total number of days the monitoring will take. This timeframe will vary based on the complexity and size of the service provider's scope.

206 The Exit Conference

The monitoring shall be concluded with an exit conference with the service provider's Director/site manager to discuss any preliminary findings and to clarify any unresolved issues identified during the review. Depending on the nature of any preliminary findings or unresolved issues, the service provider may be given time in which to correct issues prior to the issuance of the monitoring report.

207 Corrective Action Plan/Monitoring Report

207.1 Draft Report

The monitor shall write a draft report for the WDB Director's approval and signature and provide a copy to the service provider within twenty-one (21) working days after the date that the on-site

monitoring ends. The draft report shall list any findings or items for consideration that have been identified and analyzed during the desk review and on-site visit. Findings and items for consideration shall also be listed separately on a summary of case file review issues.

207.2 Findings

Findings are issues of non-compliance with a federal, state, or local law, regulation, contract provision, or policy. Findings must be addressed with a corrective action plan.

207.3 Items for Consideration

Items for consideration are less serious issues which, although not specifically non-compliant, may indicate a lack of attention to contract provisions or documentation issues which may lead to future findings. Items for consideration may or may not necessitate a corrective action plan depending on their nature.

207.4 Elements of the Draft Report

For each finding, the draft report shall include a citation of the applicable law, regulation, contract provision or policy; documentation of the observation the monitor made that indicated non-compliance, and a recommendation designed to remedy the issue. The recommendation will include a directive that the service provider develop and submit a written corrective action plan.

For each item for consideration, the draft report shall include a description of the item, documentation of the observation the monitor made that caused concern, and a recommendation designed to remedy the issue. The report shall include due dates for the development and implementation of any recommendations or corrective action plans and state whether a follow-up visit will be scheduled. If a follow-up visit is not necessary, the implementation of recommendations or corrective action plans will be addressed in the next regular monitoring.

207.5 Service Provider Response

If the service provider disagrees with the findings of the draft report, the director of the provider agency shall have ten (10) working days from the date the draft monitoring report is issued in which to respond to the WDB director in writing. If the service provider submits additional documentation to address items for consideration or clarify questions raised by the draft report,

or challenges any of its findings, the WDB Director shall have ten (10) days working days from the end of the provider response period in which to respond. Service provider responses to the draft monitoring report will be kept on file and may not be reflected in the final report unless the response contains new data, documentation, or other facts and information that the WDB determines to be relevant to the monitoring report findings.

207.6 Final Report

Whether the service provider responds or not, the report becomes final twenty (20) working days after the end of the provider response period. A copy of the final monitoring report is sent to the service provider and the report is then forwarded to the WDB for approval. The service provider will have 60 calendar days from the date the report becomes final in which to submit and implement any corrective action plan. Once approved and signed by the WDB the report becomes available for state review.

207.7 Monitoring Resolution Log

A Monitoring Resolution Log shall be completed for each monitoring and kept in the monitoring file or binder.

208 Follow-up and technical support

The monitor shall develop a schedule of systematic follow-up to ensure that any necessary corrective actions have been successfully implemented and shall ensure that WDB staff provides technical assistance as needed. Technical assistance may include arranging for training by the State Employment Development Department capacity building unit or other vendor, providing clarification and/or interpretation of WIOA regulations, and obtaining expertise and feedback on the service provider issues from WDB subcommittees.

209 Monitoring Reports and Records Retention

Monitoring reports and other records of monitoring activities must be retained for five (5) years from the date of submission of the final expenditure reports regarding the funding sources monitored. If any litigation, claim, audit, or other action involving the records has been started before the expiration of the five (5) year period, the records must be retained until completion and resolution of all such actions or until the end of the five (5) year period, whichever is later.

300 FISCAL MONITORING

The Notice of Intent to Monitor for fiscal monitoring shall indicate the areas of focus for fiscal monitoring which may include:

- Accounting records and systems;
- Cash management and payroll systems;
- Internal controls;
- Costs classification and allocation systems.

The Notice of Intent to Monitor for fiscal monitoring may include, as applicable, the following documents for the service provider's information prior to the monitoring:

- WDB monitoring policy and procedures
- WIOA Financial Questionnaire

The Notice of Intent to Monitor for fiscal monitoring may include, as applicable, the following documents to be provided to monitor at the on-site fiscal monitoring visit and review:

- Completed WIOA Financial Questionnaire
- Most recent chart of accounts, including sub-accounts, for WIOA programs and activities.
- Organization chart(s) identifying all employees, name and position, who are paid with WIOA Title-I funds.
- General ledger and sub-ledgers to record WIOA grant expenditures;
- Accounting report(s) supporting the most recent submitted cumulative expenditure reports/invoices, and the worksheets used to prepare the reports/invoices, including accrual spreadsheets and subrecipient reports/invoices, if applicable.
- Accounting report(s) used to record WIOA Title 1 fund cash receipts.
- Cost allocation plan for administering WIOA Title-1 funds for the PY being monitored.
- Individual training account policies and procedures.
- Supportive Services policies and procedures.
- Copies of prior PY monitoring reports and follow-up documents (if applicable).
- List of all locations where services (program and administrative) are being provided, incurring space costs.
- Single Audit/ Audited Financial Reports and Monitoring Reports for FY 2017-18 (draft or final) received from the County of Monterey.
- Audit resolution policies and procedures for subrecipients, including local-level hearing procedures.
- Audit resolution log.
- Debt collection policies and procedures.
- Most recently completed WIOA property inventory report for equipment purchased using WIOA funds, if applicable.

400 PROGRAM MONITORING

The Notice of Intent to Monitor for program monitoring shall indicate areas of focus for program monitoring which may include:

- The provider's strategy and approach to providing WIOA services
- Description of how the services are provided
- Program performance to date
- Review of selected participant electronic and, if applicable, hard copy case files, which will take place either during the on-site monitoring visit/review or off-site.
- Interviews conducted with a selection of participants receiving WIOA funded services which will take place either during the on-site monitoring visit/review or via telephone
- Review of program materials related to and in support of services provided to participants receiving WIOA funded services such as recruitment and orientation materials
- Program policies and procedures

The Notice of Intent to Monitor for program monitoring may include, as applicable, the following documents for the service provider's information prior to the monitoring:

- WDB monitoring policy and procedures
- WIOA Administrative Questionnaire
- Appropriate contract-specific participant questionnaire
- The percentage of participant files to be reviewed
- The number of participants to be interviewed

The Notice of Intent to Monitor for program monitoring shall indicate the documents to be provided to monitor at the on-site program monitoring visit and review.

401 Participant File Review

The monitor will review a percentage of participant case files (electronic and/or hard copy) for clients active during the PY being monitored, including carry-in clients still being served from the previous PY. The monitor shall confer with the WDB Director to determine the percentage of files to be monitored and any areas of focus to be considered. If there are areas of focus, clients in those areas shall be listed and selected separately from the general files (Stratified Sampling Method). The monitor shall randomly select the files to be monitored.

Each file shall be reviewed using the client's CalJOBS record and/or hard copy file documents. The applicable elements shall be documented on a review sheet. Findings and items for consideration shall be documented on a summary of case file review issues sheet to be included in the draft monitoring report.

401.1 Areas to be monitored in Adult and Dislocated Worker Files:

- Eligibility
 - Right-to-Work
 - Selective Service Status
 - Receipt of Equal Opportunity and Grievance/Complaint forms
 - Documentation of Basic Services
 - Documentation of Staff-Assisted/Individualized Services
 - Documentation of IEP
 - Supportive Services – in accordance with WDB policy and documented appropriately
 - Case notes depict ongoing appropriate services to client that do not indicate any gaps in services due to service provider staff lack of communication
 - Training Services – in accordance with WDB policy and documented appropriately
 - Documentation of Job Search activities
 - Performance Outcomes documented appropriately
 - Appropriate Closure procedures
 - Follow up contact conducted on time and successful
 - Follow-up services documented appropriately
 - Expenditures and Vouchers documented appropriately

401.2 Areas to be monitored in Youth Files:

- Eligibility
- In-School or Out-of-School Status
- Categories for Out-of-School eligibility
- Documentation of Low-Income status if applicable
- Right-to-Work
- Youth Work Permit
- Selective Service Status (If applicable)
- Receipt of Equal Opportunity, Nepotism, and Grievance/Complaint forms
- Documentation of ISS
- Documentation of Program Elements received
- Documentation of test scores
- Documentation of Activities, Enrollments, and Services
- Supportive Services – in accordance with WDB policy and documented appropriately
- Case notes depict ongoing appropriate services to client that do not indicate any gaps in services due to service provider staff lack of communication
- Performance Outcomes documented appropriately
- Appropriate Closure procedures
- Follow up contact conducted on time and successful
- Follow-up services documented appropriately

500 ETPL SUBSEQUENT ELIGIBILITY REVIEW

All training providers and programs on the State of California ETPL that are located within the Monterey County WDB's local area will be evaluated annually, to ensure they continue to meet eligibility to be retained on the CA ETPL beyond the period of initial eligibility. The State Board will inform the WDB ETPL coordinator via a Workforce Services Information Notice (WSIN) what performance indicators and criteria must be met in addition to the training provider remaining in compliance with the initial eligibility criteria listed in the current ETPL Policy and Procedures (WSD 15-07). The County WDB staff may perform the Subsequent Eligibility review or, at the WDB Director's discretion, the monitor may perform it. Non-compliance with any correctable subsequent eligibility element will result in the WDB staff or monitor requesting compliance from the provider, with continued follow-up until compliance is achieved. Non-compliance with mandatory performance criteria or loss of credential, accreditation, or letter of commitment, will result in de-listing of the provider or program until the provider or program meets the requirement. Prior to de-listing a program the WDB Director will send a letter to the Training Provider's director indicating the citation, the criteria that was not met, and the WDB appeal policy.

600 ETPL MONITORING

- The Notice of Intent to Monitor for ETPL monitoring shall indicate areas of focus for ETPL monitoring, as applicable:
- Program policies and procedures
- Accreditation and approval documentation
- Personnel policies and procedures
- Review of materials related to and in support of training services provided to participants receiving WIOA funded training such as:
 - (a) Marketing materials
 - (b) School catalog
 - (c) Registration forms
 - (d) Curricula related to participant training
- Student Files
- Interviews conducted with a selection of participants receiving WIOA funded services which will take place either during the on-site monitoring visit/review or via telephone
- Job search assistance and job preparation
- Vocational ESL, if provided

The Notice of Intent to Monitor for ETPL monitoring may include, as applicable, the following documents for the service provider's information prior to the monitoring:

- WDB monitoring policy and procedures

- WIOA ETPL Questionnaire
- Appropriate contract-specific participant questionnaire
- The number of participants to be interviewed

The Notice of Intent to Monitor for ETPL monitoring shall indicate the following documents to be provided to monitor at the on-site ETPL monitoring visit and review:

- Completed WIOA ETPL Questionnaire

700 NON-DISCRIMINATION AND EQUAL OPPORTUNITY (EO) MONITORING

701 Protected Categories

The nondiscrimination and equal opportunity provisions outlined in Section 188 of WIOA and 29 CFR Part 38 prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including LEP), age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only on the basis of citizenship status or participation in a WIOA Title I financially assisted program or activity. These provisions must be included in all WIOA contracts and be monitored as part of the annual program monitoring process.

702 Local EO Officer

Each WDB must appoint a Local EO officer. The EO officer may accompany the program monitor to complete the Non-Discrimination and EO portion of the monitoring, as Local EO officer has received training and ongoing technical assistance from the State regarding the requirements and best practices for effectively conducting compliance monitoring. The Local EO officer is the liaison with the EDD EEO office.

703 Non-Discrimination and EO Monitoring Procedure

The State does not mandate a specific monitoring guide or checklist to follow during monitoring, in order to allow for maximum local flexibility.

The monitoring should include a notification of the monitoring, which can be included in the Notice of Intent to Monitor provided for the program monitoring. The notification will include a request for preliminary information such as applicants/clients' demographic data, random sample applications, Local Area compliance monitoring reports, discrimination complaint logs, etc.

The procedures for Desk review, On-site monitoring review, Entrance conference, Exit conference, Corrective action plan, and Follow-up monitoring are the same as those detailed in Section 200 above.

704 Areas to be monitored for Non-Discrimination and EO compliance:

At a minimum, the Non-Discrimination and EO monitoring shall ensure the following:

Contracts, cooperative agreements, job training plans, and policies and procedures must contain the nondiscrimination assurance specified in 29 CFR Part 38.

The "[Equal Opportunity is the Law](#)" poster is:

- Posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on the recipient's website pages.
- Disseminated in internal memoranda and other written or electronic communications with staff. Included in employee and participant handbooks or manuals regardless of form, including electronic and paper form if both are available.
- Provided to each participant and employee and made part of each employee's and participant's file.
- Provided in appropriate formats to registrants, applicants, eligible applicants/registrants, and applicants for employment and employees and participants with visual impairments and a record that such notice has been given made part of the employee's or participant's file.
- Provided in appropriate languages other than English.

Recipients must indicate that the WIOA Title I-financially assisted program or activity in question is an "equal opportunity employer/program," and that "auxiliary aids and services are available upon request to individuals with disabilities."

This must be included on recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper to staff, clients, or the public at large, to describe programs financially assisted under WIOA Title I or the requirements for participation by recipients and participants.

Where such materials indicate that the recipient may be reached by voice telephone, the materials must also provide the TTY number or equally effective communications system, such as a videophone, captioned telephone, or a relay service. The California Relay Service can be reached by dialing 711 or 1-800-735-2922.

A discussion of rights and responsibilities under the nondiscrimination and equal opportunity provisions of WIOA Section 188 and 29 CFR Part 38, including the right to file a complaint of discrimination with the recipient or the Director of the DOL's Civil Rights Center (CRC) must be included in each presentation to orient new participants, new employees, and/or the general public to its WIOA Title I-financially assisted programs or activity, whether this be in person or over the internet or using other technology. This information must be communicated in appropriate languages as required in 29 CFR Section 38.9 and in formats accessible for individuals with disabilities as required in 29 CFR Part 38 and specified in Section 38.15.

Each recipient must collect and maintain nondiscrimination data including, but not limited to, records on applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment. Each recipient must record the race/ethnicity, sex, age, and where known, disability status, of every applicant, registrant, participant, terminee, applicant for employment, and employee. Such information must be kept for a period of not less than three years from the close of the applicable program year, stored in a manner that ensures confidentiality, and must be used only for the purposes of any of the following:

- Recordkeeping and reporting.
- Determining eligibility, where appropriate, for WIOA Title I-financially assisted programs or activities.
- Determining the extent to which the recipient is operating its WIOA Title I-financially assisted program or activity in a nondiscriminatory manner.
- Other use authorized by law.

Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they must be locked or otherwise secured (e.g., through password protection)

As indicated in 29 CFR Section 38.41, "LEP and preferred language" has been added to the list of categories of information that each recipient must record about each applicant, registrant, eligible applicant/registrant, participant, and terminee. This requirement does not apply to recipient's employees.

Each recipient must promptly notify the state or CRC when any administrative enforcement actions or lawsuits are filed against it alleging discrimination on any basis listed in 29 CFR Part 38.

Each recipient must maintain a log of complaints filed with the recipient that allege discrimination on any basis protected by 29 CFR Part 38. The log must include the following:

- The name and address of the complainant
- The basis of the complaint
- A description of the complaint
- The date the complaint was filed
- The disposition and date of disposition of the complaint
- Other pertinent information

Information that could lead to identification of a particular individual as having filed a complaint must be kept confidential.

Recipients must make reasonable efforts to provide equal access to and include members of the various groups protected by 29 CFR Part 38 to ensure that they are providing equal access to their WIOA Title I-financially assisted programs and activities.

Recipients must not do any of the following:

- Deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, service, or training, including meaningful opportunities to seek employment and work in competitive integrated settings.
- Afford a qualified individual with a disability an opportunity to participate in or benefit from the aid, benefits, services, or training that is not equal to that afforded others.
- Provide a qualified individual with a disability with any aid, benefit, service, or training that is not as effective in affording equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as that provided to others.
- Provide different, segregated, or separate aid, benefit, service, or training to individuals with disabilities, or to any class of individuals with disabilities, unless such action is necessary to provide qualified individuals with disabilities with any aid, benefit, service, or training that is as effective as those provided to others, and consistent with the requirements of the Rehab Act as amended by the WIOA, including those provisions that prioritize opportunities in competitive integrated employment.
- Deny a qualified individual with a disability the opportunity to participate as a member of planning or advisory boards.

- Otherwise limit a qualified individual with a disability in enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving any aid, benefit, service, or training.

No qualified individual with a disability may be excluded from participation in, or be denied the benefits of a recipient's service, program, or activity or be subjected to discrimination by any recipient because a recipient's facilities are inaccessible or unusable by individuals with disabilities.

With regard to any aid, benefit, service, training, and employment, a recipient must provide reasonable accommodations to qualified individuals with disabilities who are applicants, registrants, eligible applicants/registrants, participants, employees, or applicants for employment, unless providing the accommodation would cause undue hardship.

800 ACTION

This policy memorandum is on-going and effective immediately. All WIOA Service Providers shall comply with the provisions of this policy from the date of its adoption.

801 INQUIRIES

Any questions regarding this policy memorandum may be directed to the WDB Director.

1000 ATTACHMENTS

1000.1	Intent to Monitor Letter
1000.2	WIOA Administrative Questionnaire
1000.3	WIOA Financial Questionnaire
1000.4	Summary Case File Review
1000.5	Programmatic Monitoring Resolution Log
1000.6	Template for Draft Report
1000.7	Template for Final Report