



**Missouri Office  
of Workforce Development**  
Missouri Department of Economic Development

# OWD Issuance 12-2019

(Release Number—Program Year)

Release Date:  
December 06, 2019  
Effective Date:  
December 06, 2019  
Expiration Date:  
Continuous, until further notice

**SUBJECT:**

## Statewide Sub-State Monitoring Policy

**ATTACHMENTS:** (1)—Statewide Sub-State Monitoring Requirements

*This Issuance is Official Policy  
of the Missouri Office  
of Workforce Development*

**ISSUING AUTHORITY:**

Mardy Leathers  
Director  
Missouri Office of  
Workforce Development

**THIS ISSUANCE REQUIRES REVIEW,  
CREATION, OR ALTERATION OF A  
CORRESPONDING LOCAL POLICY**

**KEYWORDS:**

Local Plans and Policies; Monitoring;  
Sub-State; Workforce Innovation and  
Opportunity Act (WIOA)

**THIS ISSUANCE AFFECTS:**

Missouri One-Stop Delivery System (MJC/AJCs)  
WIOA Title I Local Areas/Local Boards/Local Plans  
WIOA Title I Performance/Accountability  
WIOA Section 188 Nondiscrimination Issue  
WIOA Fiscal/Administrative Procedures  
State of Missouri Workforce System Procedures

**FOR THE ATTENTION OF:**

OWD State Professional Staff  
One-Stop frontline staff  
Local WDB Chairpersons  
Local WDB Directors  
One-Stop Operators  
One-Stop Functional Leaders  
Local Equal Opportunity Officers  
Local Quality Assurance Monitors

**RESCISSIONS:**

DWD Issuance 16-2018, “Statewide Sub-State Monitoring Policy,” June 19, 2019

**REFERENCES:**

[OWD Issuance 09-2019](#), “Local and Regional Plan Guidelines for Local WDBs,” October 08, 2019.  
U.S Department of Labor, Employment and Training Administration, Training and Guidance Letter [\(TEGL\) 7-18](#)  
“Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (WIOA),” December 19, 2018.

**SUMMARY:**

This Issuance updates the Office of Workforce Development (OWD) Sub-State Monitoring Policy for Local Workforce Development Areas (LWDA) designated under WIOA.<sup>1</sup> Technical revisions conform to federal and State laws, regulations, and policies updated or finalized since the issuance of the previous guidance,<sup>2</sup> which this Issuance supersedes and rescinds.

**BACKGROUND:**

WIOA mandates<sup>3</sup> administrative and **program oversight** responsibilities that, in partnership with the Chief Elected Official (CEO), are inherent functions of the Local Workforce Development Board (LWDB) serving an LWDA:

*“The local board, in partnership with the chief elected official for the local area, shall—  
(A)(i) conduct oversight for local youth workforce investment activities authorized under section 129(c), local employment and training activities authorized under subsections (c) and (d) of section 134, and the one-stop delivery system in the local area; and*

<sup>1</sup> Pub. L. 113-128 [[29 U.S.C. 3101, et seq.](#)].

<sup>2</sup> DWD Issuance 16-2018, “Statewide Sub-state Monitoring Policy,” June 19, 2019, *herein rescinded*.

<sup>3</sup> WIOA sec. 107(d)(8) [[29 U.S.C. 3122\(d\)\(8\)](#)].

- (ii) ensure the appropriate use and management of the funds provided under subtitle B for the activities and system described in clause (i); and
- (B) for workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcomes under section 116.”

Subparagraphs A(ii) and B above refer to WIOA local oversight responsibilities.

Further, the U.S. Department of Labor (DOL) implementing regulations for WIOA require:<sup>4</sup>

“(a) Each recipient and subrecipient of funds under title I of WIOA and under Wagner-Peyser must conduct regular oversight and monitoring of its WIOA and Wagner-Peyser program(s) and those of its subrecipients and contractors as required under Title I of WIOA and Wagner-Peyser, as well as under 2 CFR Part 200, including 2 CFR 200.327, 200.328, 200.330, 200.331, and Department exceptions at 2 CFR part 2900, in order to:

- (1) Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the Act and the regulations in this part;
- (2) Determine whether there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations;
- (3) Assure compliance with 2 CFR part 200; and
- (4) Determine compliance with the nondiscrimination, disability, and equal opportunity requirements of Section 188 of WIOA, including the Assistive Technology Act of 1998 ([29 U.S.C. 3003](#)).”

These regulations establish requirements under the Uniform Guidance<sup>5</sup> for sub-state monitoring according to federal cost principles and audit requirements. This includes requiring an examination of subrecipient non-discrimination and conflict-of-interest policies, and mandatory disclosures of all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award.

**SUBSTANCE:**

The oversight role of the State monitoring system (OWD’s monitoring of LWDBs) includes issuing additional requirements and monitoring instructions to subrecipients on monitoring activities. The **Attachment** to this Issuance discusses the monitoring requirements for the LWDBs and includes an offer of technical assistance from OWD, upon request.

**ROLES, RESPONSIBILITIES, and REQUIRED ACTIONS:**

Each LWDB must review its local sub-state monitoring plan for compliance with this statewide policy. Alterations should be communicated to the LWDB’s Director and Local Compliance Monitor. The sub-state monitoring plan has been and will continue to be a required component of the Local Plan for the LWDA.

**TIMELINE:**

**All Missouri Workforce System Staff** — Implementation of these rules.....**Immediate and Continuous**

**INQUIRIES:**

Please direct all questions or comments regarding this Issuance document to [dwdpolicy@dhewd.mo.gov](mailto:dwdpolicy@dhewd.mo.gov). All active Issuances are available at [jobs.mo.gov/dwdissuances](http://jobs.mo.gov/dwdissuances). Expired/rescinded Issuances are available on request.

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*Missouri Department of Higher Education and Workforce Development is an [equal opportunity](#) employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri Relay Services at 711.*

<sup>4</sup> [20 CFR 683.410\(a\)](#).

<sup>5</sup> 2 U.S.C. Grants and Agreements, Chapter II—Office of Management and Budget Guidance, [Part 200](#) “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards”; Chapter XXIX—Department of Labor, [Part 2900](#) “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards”; and Chapter XXIX—Department of Labor, [Part 2998](#) “Nonprocurement Debarment and Suspension.”