



# Monitoring Policy

Approval Date: September 5, 2025

## **Purpose**

Greater Cleveland Work's monitoring policy has been developed to review, analyze and report on the activities and service provided by local Workforce Area 3. The focus is to monitor funds allocated under contractual arrangements, for compliance with federal, state, and local laws, regulations, procedures, and practices. Monitoring provides reasonable assurance of compliance with state and local policies, internal procedures, state performance regulations, and award provisions.

The purpose of monitoring reviews is to ascertain that subrecipients and contractors are administering their contract in accordance with the financial and programmatic applicable requirements. Monitoring reports will be used to develop information about the subrecipient/contractor that may be the basis for corrective action, providing needed documents or technical assistance, discontinuing further financial assistance, or identifying exemplary practices that other subrecipients/contractors may adopt.

## **Definitions**

Subrecipient: A non-federal entity that received a subaward for the purpose of carrying out part of a deferral award. The subaward creates a federal assistance relationship with the subrecipient. (See 2 CFR 200.93 & .330 (a) of the Uniform Guidance.)

Contractor: A non-federal entity that receives a contract for the purpose of providing goods and services for the awarding non-federal entities own use. The contract creates a procurement relationship with the contractor. (See 2 CFR 200.22 & .330 (b) of the Uniform Guidance.)

## **Policy**

All subrecipients/contractors will be formally monitored at least once each program year (July 1 – June 30) or as needed for the duration of any agreement.

Monitoring will be the responsibility of the Contract & Compliance Manager or other Greater Cleveland Works designee. The Contract & Compliance Manager, with the support of program and finance personnel will schedule reviews, determine the scope of the review, perform monitoring fieldwork, write monitoring reports, and perform resolution of monitoring findings/issues.

The review will cover the subrecipients/contractors internal controls, accounting system, financial reporting and recordkeeping, and compliance with all programmatic requirements. Information is to be obtained from the examination of documents, reports, records and participant files, direct observation, and discussions.

The review will also assess the following:

1. Greater Cleveland Works has established appropriate systems for procurement and awarding and monitoring of contracts with subrecipients/contractors. The system establishes clear standards of accountability.



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2. Greater Cleveland Works developed a contract with an agreed Scope of Work with goals, obligations, and performance measurements in unambiguous terms.
3. The subrecipient/contractor staff implementing activities attended required meetings and/or trainings offered by ODJFS, Greater Cleveland Works or other applicable entities.

Greater Cleveland Works will take prompt and appropriate corrective action upon discovery of any evidence of violation of any federal, state provision and/or local policies and/or agreements.

Greater Cleveland Works reserves the right to end the contract with the subrecipient/contractor for nonperformance, noncompliance, or failure to comply with corrective action. In addition, Greater Cleveland Works may require repayment of funds that are spent in a manner that does not meet program performance, local policy, state/federal regulation, or law.

If corrective action or fund repayment by the subrecipient/contractor is required, such action will result in a loss of points in the competitive scoring for the next procurement for which the subrecipient/contractor applies.