



Workforce Issuance

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☒ Policy ☐ Information

To: MassHire Workforce Board Chairs
MassHire Workforce Board Directors
MassHire Career Center Directors
MassHire Fiscal Officers
MDCS Operations Managers

cc: WIOA State Partners

From: Beth Goguen, Director
MassHire Department of Career Services

Date: October 24, 2025

Subject: **MassHire Department of Career Services Field Management and Oversight Fiscal Year 2026 Monitoring and Biennial Systems Certification Review of the MassHire Workforce Boards**

Purpose: To notify MassHire Workforce Boards (MWBs) of monitoring for Fiscal Year 2026 (FY26) and to provide the Commonwealth's related policy for monitoring provisions and respective responsibilities of the local Boards, sub-recipients, and contract service providers.

Background: The Executive Office of Labor Workforce Development (EOLWD) MassHire Department of Career Services (MDCS) is the designated State Workforce Agency (SWA) responsible for oversight of the Massachusetts Workforce Development System.

As such, MDCS must monitor the activities of MassHire Workforce Boards and Career Centers funded under the Workforce Innovation and Opportunity Act (WIOA), the Wagner Peyser Act and other state and federal awards operating through the workforce system to ensure compliance with applicable federal and state requirements and performance expectations. Monitoring by the MDCS must cover each program, function, or activity (2 CFR 200.328).

To ensure the integrity of local programmatic and fiscal systems, MDCS monitors program and fiscal performance of local areas on an annual basis to ensure compliance with all local, state and federal policies, procedures and regulations that govern the grants operated through the MassHire system.

Policy: The MassHire Department of Career Services Field Management and Oversight Unit will conduct the FY26 Annual Monitoring Reviews for every MassHire workforce area, as well as Systems Certification Review (which occurs on a biennial basis), in accordance with all related state and federal policies, procedures, and regulations that govern the grants operated through the MassHire system.

While MWBs are required to complete annual monitoring by the end of each fiscal year, MWBs must follow the timeline and activity deadlines outlined in the local monitoring policies and SOPs once the CC monitoring begins. *MDCS will review the local area monitoring policy/timelines when conducting the annual review to ensure compliance.*

Action

Required: MassHire Workforce Boards and Fiscal/Administrative Entities must have documented internal policies in place to ensure compliance with federal and state program and fiscal monitoring activities. MassHire Workforce Boards must also assure that all appropriate workforce board and career center staff and management are notified of the upcoming monitoring dates, activities, and requirements for the FY26 review(s). MDCS Field Management and Oversight (FMO) Program Coordinators will reach out directly to assigned areas with the FY26 monitoring schedule.

Effective: Immediately

References: Workforce Innovation and Opportunity Act section 184(a) (4)
20 CFR 683.410
2 CFR 200
2 CFR 2900

Inquiries: Please direct all inquiries to PolicyQA@mass.gov; please indicate Issuance number and description

Attachments:

- A. FY26 MDCS Program Elements
- B. FY26 Career Center Program Questionnaire
- C. FY26 Customer Program File Review
- D. FY26 Youth Customer Program File Review
- E. FY26 American with Disabilities Act Compliance/EEO/Complaint
- F. FY26 Language Access Assessment (LEP)
- G. FY26 Veterans Caseload Data Analysis Sheet (VCDAS)
- H. FY26 Required Poster List <https://www.mass.gov/info-details/ajc-posters>
- Ha. FY26 Required Posters (fillable)

- Hb. FY26 Required Poster (printable)
- I. JVSG Eligibility Screening Tool
- J. FY26 Complaint Officer Listing
- Ka. FY26 Initial RESEA Review Checklist (fillable)
- Kb. FY26 Initial RESEA Review Checklist (printable)
- La. FY26 RESEA Review Checklist (fillable)
- Lb. FY26 RESEA Review Checklist (printable)
- Ma. FY26 CCS Checklist (fillable)
- Mb. FY26 CCS Checklist(printable)
- N. FY26 Workforce Board Questionnaire
- O. FY26 Youth Frameworks Questionnaire

Compliance Monitoring Elements:

I. Customer File Review (for all applicable programs)

1. MDCS will examine customer files for timeliness, accuracy, and compliance from the following programs: Title I Adult, Dislocated Worker, Youth*, Jobs for Veterans State Grants (JVSG), Trade Adjustment Assistance (TAA), and Reemployment Services and Eligibility Assessment (RESEA) from the appropriate fiscal year. Files of customers who have been exited during the pertinent fiscal year may be reviewed as part of the sample.

**MWBs that provide framework services for Youth in the local area cannot monitor the Youth files to comply with annual monitoring. For these areas, MDCS is responsible for monitoring the Youth files within the annual monitoring of the MWB.*

II. Program Monitoring:

1. Will be conducted at least one time per program year and preceded by a notification to the respective Workforce Board management at least *two weeks* in advance of the monitoring review.
2. Will include inspection of programs and review of compliance for physical locations used by staff/customers to ensure adherence to local, state, and federal accessibility and American with Disabilities Act (ADA) policies.
3. Will include a review of all Elements listed in this policy (also see attachments) and required MDCS questionnaires, surveys, tools and attachments within this policy completed by the local MWB/MWB designee.
4. May include interviews of MWB and Career Center management/staff, partners, jobseeker, and business customers. MDCS will communicate directly with MWBs to discuss monitoring schedule information. MWBs must also communicate directly with Career Center management and other stakeholders to provide monitoring schedule information to avoid disruption to any service.

III. *Program Performance and Compliance Monitoring includes but is not limited to:*

1. Program operation and compliance
2. Performance measurements
3. Review of intake and referral processes; including partner collaboration
4. Review of customer flow
5. Review of the eligibility determination process
6. Review of educational assessment tools
7. Review of vocational and on-the-job training programs, work experience and credential attainment
8. Record keeping and file maintenance
9. Data recording and reporting, including data integrity and quality
10. Local policies and procedures

IV. *Compliance monitoring of program administration and management practices*

Includes, but is not limited to:

1. Review of non-discrimination/Equal Employment Opportunity (EEO) compliance, ADA compliance, policies, and procedures
2. Local area management practices and integration with the Career Center management/staff

V. *Exit Interview/meeting*

MDCS will conduct a formal Exit Interview/meeting with the MassHire Workforce Board and interested parties at the conclusion of the monitoring review to discuss the results of the review. The Exit Interview/meeting will be held within thirty working days of completing the review of all monitoring elements.

VI. *Report(s)*

A written report will be sent to the MassHire Workforce Board within thirty working days of completion of the Exit Interview/meeting. The MassHire Workforce Board will be given no less than thirty working days to provide a written response to Findings and/or (if applicable) Areas of Concern.

If Corrective Action is required, progress will be monitored by MDCS and, as applicable, the MWB, until all findings have been resolved.

VII. *Areas of Concern/Observation & Findings of Non-Compliance*

Areas of Concern/Observation:

If an indicator is not met and the Reviewer believes that it could lead to a future Finding or have an adverse result if not addressed, an Area of Concern or Observation is identified.

These are not specific compliance violations and, as a general practice, *no corrective action is specified or required but may instead include guidance and/or suggestions for improvement.*

Finding(s) of Non-Compliance:

A *Finding* is a violation of a specific compliance requirement contained in law, regulations, national policies, FOA, Uniform Guidance or OMB Circulars, the grant terms and conditions, ETA policy guidance, including Training and Employment Guidance Letters

(TEGLs) or Training and Employment Notices (TEN), and/or the grant agreement. A Finding *requires specific corrective action.*

If, as result of compliance and performance monitoring or otherwise, MDCS has determined that non-compliance and/or a violation of provisions of law, regulations, policies, FOA, Uniform Guidance or OMB Circulars, the grant terms and conditions, ETA policy guidance, including Training and Employment Guidance Letters (TEGLs) etc. compliance.

For additional guidance, please refer to related local, state, and federal policies and see below.

▪ **Corrective Action**

In the event that the performance of a MassHire Workforce Board (MWB)/ local area is below minimum standards, a corrective action plan will be developed by MDCS and/or the MWB to improve performance, as appropriate. MDCS will follow up with performance monitoring to determine if the deficiency has been corrected. If the MWB/local area is deemed to be following the corrective action plan, a letter will be sent to the MWB advising that the corrective action goals have been met.

If the MWB/local area fails to correct the deficiency, the MWB/local area will receive written notice that the program is to be placed on probation. The notice will indicate the effective date of the probation and the duration of the probation. The probationary period will not be less than thirty days or more than ninety days.

The MassHire Workforce Board/local area will be notified in writing five days before the probation period expires of one of the following:

- The probation will be terminated
- The program will be terminated
- The probation will be extended for a period not to exceed 90 days.

High Risk Service Provider: A high-risk service provider determination may be made by MDCS where:

- Monitoring activities discover disallowed costs
- When a service provider fails to attain a minimum WIOA Performance Measures
- Service provider action results in negative public relations
- Additional criteria may be established for data validation

High-risk service providers may be monitored quarterly until such a time as MDCS determines that the identified issues have been resolved satisfactorily, and that systems and procedures have been adapted appropriately to MDCS' satisfaction. MDCS may initiate a full program review each quarter and desktop reviews monthly.

▪ **Appeals**

1. A MassHire Workforce Board/ local area dissatisfied by an MDCS determination to impose a sanction(s) or corrective action(s) may file a written appeal as indicated in this section.
2. Grounds for appeals:
 - a) findings of non-compliance
 - b) disallowed costs
3. A MassHire Workforce Board interested in filing an appeal must exhaust the remedies provided in this policy prior to seeking additional relief
4. A MassHire Workforce Board who fails to exhaust the administrative remedies provided in this policy waives its rights to file an appeal.
5. Appeals made under this section, with respect to findings of non-compliance, shall be made no later than 30 days after receipt of monitoring report.
6. Appeals made under this section, with respect to disallowed costs, shall be made no later than 30 days after receipt of final disallowed costs letter from MDCS
7. The written appeal shall state the following:
 - a) MassHire Workforce Board name, address, contact information;
 - b) The imposed sanction(s) that constitute the basis for the appeal;
 - c) Support documentation to support and/or validate the basis of the appeal;
 - d) Form of relief requested.
8. The written appeal shall be directed to the MDCS Director.
9. MDCS will issue a determination no later than thirty (30) business days after receipt of the appeal.