

# **Eligible Training Provider List (ETPL) Training Provider Monitoring Procedures**

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Beginning each year (July 1) through (June 30), the Quality Assurance and Integrity Administration (QAIA) will monitor a minimum of fifteen percent (15%) of the approved Eligible Training Providers listed on the Eligible Training Provider List (ETPL). Monitoring will assess the training provider for accuracy of training provider information in the Arizona Job Connection (AJC) ProviderLink system and compliance with training provider requirements.

## **1) Eligible Training Provider Sample**

Prior to the beginning of each year, the Compliance Manager will pull the list of approved ETPL training providers from ProviderLink in AJC or Tableau and identify a minimum of fifteen percent (15%) of the training providers that must be monitored between (July 1) and (June 30).

1. The Compliance Manager will select the number of training providers to be monitored during the review period.
  - a. Determine the audit scheduled for the year and assign each QAIA auditor the approved training providers to be monitored during the review period.
2. QAIA may monitor more than (15%) percent, up to (100%) percent of the approved ETPL training providers; if resources are available.

## **2) Preparing for the Monitoring Review**

The QAIA auditor will send an email notification of the intended monitoring date to the training provider attached with monitoring procedures, monitoring tool and Workforce Arizona Council ETPL Policy for training provider responsibilities to prepare for the required monitoring review.

1. QAIA auditor will send an email notification of the intended monitoring date to the training provider at least thirty (30) calendar days prior to review.
  - 1.1. Attach Email notification with ETPL Monitoring Procedures, ETPL Monitoring Tool and Workforce Arizona Council ETPL Policy.
2. Second email notification will be sent at least five (5) business days prior to the intended monitoring date to the training provider confirming the schedule monitoring review.
  - 2.1. Notifications must be sent to the Eligible Training Provider point of contact, copying the following:  

cc: QAIA Compliance Manager	State ETPL Manager
QAIA Audit Manager	LWDB Director
QAIA Audit Administrator	LWDB Chair
Local ETPL Coordinator	

### **3) Eligible Training Provider Monitoring Report**

1. Upon completing the scheduled monitoring review the QAIA auditor will draft a monitoring report within two (2) business days and send it to the Compliance Manager.
2. The Compliance Manager has ten (10) business days to review and approve the monitoring report.

2.1. If approved, the report is returned to the auditor to issue the monitoring report to the training provider point of contact, copying the following:

cc: QAIA Compliance Manager	State ETPL Manager
QAIA Audit Manager	LWDB Director
QAIA Audit Administrator	LWDB Chair
Local ETPL Coordinator	

2.2. The training provider is provided ten (10) business days from the date of issuance of the monitoring report to provide a written response and if applicable upload documents in ProviderLink in AJC to address discrepancies, missing information or missing documents.

2.3. Monitoring report may include the following:

2.3.1. Findings – Finding will identify the specific areas of concern, policy or procedural requirements and require corrective action

2.3.2. Observations – Observations are provided as a courtesy and do not carry the force of findings. Observations are items of note found during the monitoring review that should be reviewed and acted upon to ensure they do not further escalate or in any other regard become more serious as to result in a later finding. These items are not viewed as an error, but a means to improve performance going forward. No response is required/should be submitted for observations.

### **4) How to Respond to the Monitoring Report**

The training provider will be required to respond to each identified finding noted in the monitoring report and provide a written response. The training provider may either agree or disagree with a finding.

1. If the training provider agrees to the finding, the training provider must provide a written resolution, upload the missing documentation (if applicable) or correct the information entered in AJC Provider Link.
  - 1.1. If the finding cannot be corrected, the training provider will provide an explanation in their written response to address the uncorrected finding.
  - 1.2. If the training provider disagrees with the finding. The training provider must provide a written response included the following:
    - 1.2.1. Identify the disputed finding and the reason the finding should not be counted as incorrect;
    - 1.2.2. Including a policy or procedural reference to support the reasoning.
2. The training provider will provide a written response to the monitoring report within ten (10) business days.
  - 2.1. Upon receipt QAIA will review the training provider's response within ten (10) business days.
    - 2.1.1. Validate the corrected finding(s) in Provider Link in AJC and close out each finding noted in the monitoring report.
    - 2.1.2. If the training provider agrees to a finding that has not been corrected in ProviderLink in AJC. QAIA will send a 2nd notification request with the monitoring report, requesting the finding be corrected within five (5) business days.
    - 2.1.3. If the training provider disagrees with a finding noted in the monitoring report, QAIA will follow the dispute resolution process in Section (7) of the monitoring procedures outlined below.
    - 2.1.4. QAIA will issue a closure letter once all findings have been addressed or corrected.

## **5) Non-Compliance**

If the training provider does not respond within ten (10) business days to correct noted finding(s) and/or provide documentation, QAIA will issue a 2nd notification requesting a response within ten (10) business days.

1. If corrections are not made or documentation is not provided, the training provider will be issued a closure letter for failure to respond to the

monitoring report or request and noted non-compliant for the identified program year.

- 1.1. QAIA will forward the letter of non-compliance to the Finance & Business Operations Administration (FBOA) to determine if further action is required.

## **6) Substantial Violation**

DES may implement a substantial violation, sanction, decertification and/or reorganization reference outlined in the [Workforce Arizona Council Eligible Training Provider List \(ETPL\) Policy](#). Section (14.) which may include any of the following:

- Failure to respond to requests to provide documentation to DES
- DES or the LWDB determines that the institution intentionally supplied inaccurate information within the state system of record (AJC).
- Failure to comply with corrective action required as a result of the DES monitoring review.

## **7) Dispute Process**

The Quality Assurance Integrity Administration (QAIA) Auditor and Compliance Manager will review the training provider's written response to the disputed finding(s). QAIA will provide a response to address the disputed finding(s) as follows:

1. The auditor must provide a written response within ten (10) business days to uphold or overturn the disputed finding in the monitoring report.
  - 1.1. If the auditor notes an error was made in citing the disputed finding, the auditor must overturn (vacate) the finding in the written response.
    - 1.1.1. Remove the finding from the monitoring report and update the accuracy rate. The updated accuracy rate will be noted in the final copy of the monitoring report sent with the closure letter.
  - 1.2. If the auditor concludes the disputed finding was correctly cited, the auditor will uphold the finding in the monitoring report and submit it to the Compliance Manager for review.
    - 1.2.1. The Compliance Manager must review and agree that there is merit to uphold the disputed finding.

- 1.3. The upheld finding(s) will be returned to the training provider for a final response.
2. If the training provider agrees with QAIA's decision to uphold the noted finding(s). The training provider must provide a written resolution, upload the missing documentation (if applicable) or correct the information entered in AJC Provider Link.
  - 2.1. If the finding cannot be corrected, the training provider will provide an explanation in their written response to address the uncorrected finding.
    - 2.1.1. The training provider will provide a written response to the monitoring report within ten (10) business days.
    - 2.1.2. Upon receipt QAIA will review the training provider's response. QAIA will ensure finding(s) have been corrected and issue a closure letter.
  - 2.2. If the training provider still does not agree with QAIA's decision to uphold the finding(s), the finding(s) may be elevated to the Workforce Policy Unit through the [titlepolicy@azdes.gov](mailto:titlepolicy@azdes.gov) mailbox for review by the Workforce Policy Unit.
    - 2.2.1. The QAIA Auditor, Compliance Manager, Audit Administrator, Local ETPL Coordinator, State ETPL Manager, the LWDB Director and LWDB Chair must be copied on all disputes elevated to the Policy Unit.
3. The Workforce Policy Unit must provide a final decision to either uphold the QAIA Auditors decision or overturn the finding.
  - 3.1. The Workforce Policy Unit must issue a final ruling within ten (10) business days to the training provider point of contact, coping the following:  

cc: QAIA Compliance Manager	State ETPL Manager
QAIA Audit Manager	LWDB Director
QAIA Audit Administrator	LWDB Chair
Local ETPL Coordinator	
4. Upon receipt of the final ruling from the Workforce Policy Unit, QAIA and the training provider will review the final ruling and take appropriate action as follows:
  - 4.1. Upheld finding(s) must be addressed by the training provider within ten (10) business days from the final ruling.

- 4.1.1. The training provider must provide a written resolution, upload the missing documentation (if applicable), or correct the information entered in AJC Provider Link.
- 4.1.2. The training provider will submit their written response to the auditor within ten (10) business days.
- 4.1.3. The QAIA auditor will validate the corrections and issue a closure letter within five (5) business days from the training provider's response.
- 4.2. If the finding(s) are overturned, in part or in their entirety, an adjusted monitoring report will be issued by the QAIA auditor and sent with the closure letter.
- 4.3. If there are no upheld findings a closure letter will be sent within two (2) business days from the final ruling with the adjusted monitoring report.

## **8) Records**

### **Monitoring Report Tracking**

- 1. All monitoring letters & reports (review notification letters, closure letters, monitoring tool & the training provider's response) will be saved in the respective ETPL Google shared folders.
  - 1.1. The assigned auditor will be responsible for tracking the status of the respective training provider's responses.
  - 1.2. The Compliance Manager will track the status of each review internally to ensure that the process is complete by the required deadlines. The status of all monitoring reviews will be tracked on the ETPL Monitoring Review Tracking Log.

### **File Format/Retention**

- 1. Monitoring reviews materials will be kept in the respective ETPL Google shared folders.
  - 1.1. All records pertaining to the monitoring review are available in the QAIA ETPL Section for review by DOL, Audit Management Services, and the Auditor General's Office for federal oversight of the State's monitoring responsibilities for Arizona's ETPL's receiving WIOA Title I-B funds.
  - 1.2. All records shall be maintained for a period of three (3) years.

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