

# WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) TITLE I-B PROGRAM PROGRAMMATIC MONITORING REVIEW PROCEDURES

Beginning each Program Year (July 1) the WIOA Title I-B Field Operations Auditor will send an introduction letter to the ARIZONA@WORK Local Workforce Development Areas (LWDA's) to provide an update on the coming year's monitoring process and requirements. The reviews will be scheduled between the months of September through June for the identified program year.

## I. DESK REVIEW PROCESS

### Scheduling the Desk Review

1. An email notification will be sent to the LWDA a minimum of thirty (30) days prior to a desk audit notifying the LWDA that files and supporting documents must be uploaded in Arizona Job Connections (AJC). Except for disability documents, which must be sent by secure email to the WIOA mailbox [QAWIOA@azdes.gov](mailto:QAWIOA@azdes.gov). The Auditor will provide a start date for review of the files.
2. The second notification will be sent to LWDA identifying the participants to be reviewed ten (10) business days prior to the review date.
3. Participant reports will be generated from the Tableau tool which pulls from data in the AJC system for each WIOA Title I-B program funding stream (Adult, Dislocated Worker, In-School Youth, and Out-of-School Youth) to identify and select the active and exit participant files (refer to Preparing for the Review: Section II).

## II. PREPARING FOR THE REVIEW

### Preliminary Review

The preliminary review and file records preparation must be completed no later than two (2) business days prior to the review by the Title I-B Field Operations Auditor. Auditors will review and/or prepare the following in the week prior to the monitoring:

1. Generate or request the following reports for review:

#### Tableau WIOA Reports (AJC Data)

Enrollment Participations Report

#### Tableau Case Management Reports (AJC Data)

Out-of-School Youth and In-School Youth

Adult & Dislocated Worker

2. Review AJC—participants/application, activities, and case notes, etc. (Program Details page, Enrollment page, Demographics page, Service & Training Plan, Annual report - Measurable Skills Gain page).

### Generating Participant Cases for Review

- A. **Tableau (AJC data) Reports** – Generate participant reports for each WIOA Title I-B program funding stream (Adult, Dislocated Worker, In-School Youth, and Out-of-School Youth) to identify and select the active and exit participant files.
- B. **Selection of Participant Files** – Obtain the list of participant files from Tableau to select for case reviews. The selection of participant files is as follows:
  1. Seven (7) cases will be selected from each funding stream (*adult, dislocated worker, out of school and in-school youth*) for a total of 28 participant files (*if less than seven (7) cases exist in any category, all files within that category will be reviewed*).

## III. COMPLETING THE CASE REVIEW MONITORING REPORT

### Compiling of Review Data

The **draft** monitoring report may include the following:

1. Findings
2. Observations

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3. Procedural Issues
4. Best Practices

## **Case Review Monitoring Report**

The **draft** monitoring report will be completed by the WIOA Title I-B Field Operations Auditor upon completion of the review and sent to the QAIA Audit Supervisor for review/approval within ten (10) business days.

The supervisor will review the draft report within five (5) business days. If approved, the report is returned to the auditor and the auditor will send the final report to the LWDA, copying the following:

cc: QAIA Audit Manager  
QAIA Audit Supervisor  
QAIA Audit Coordinator  
Director of the Local Workforce Development Board (LWDB) Chair or Nineteen Tribal Nations

## **Failure to respond to correspondence**

Desk reviews are deemed non-compliant if the LWDA fails to respond to notifications. A second request will be issued allowing the LWDA to respond via email, telephone or provide case files within ten (10) business days. Failure to respond via email, telephone or to provide case files will result in non-compliance with the WIOA Desk Audit. A letter will be sent stating the review is closed due to non-compliance.

## **How to Respond to Monitoring Report:**

The Auditor will issue the monitoring report via email to the LWDA, with a copy to the Chairman of the LWDB or Nineteen Tribal Nations Director.

- 1) **Findings** – The monitoring report identifying the specific findings and areas of concern will be sent via email to the LWDA, with a copy to the Chairman of the LWDB or Nineteen Tribal Nations Director. The LWDA is provided twenty (20) business days from the date of issuance of the monitoring report to respond.
  - a) A closure letter will be sent to the LWDA with a copy to the Chairman of the LWDB or Nineteen Tribal Nations Director. If the LWDA's monitoring report does not meet compliance, a findings closure letter will be issued. If the LWDA agrees with the findings, a response to address the deficiencies must be submitted to the WIOA Title I-B Field Operations Auditor within twenty (20) business days.
  - b) If the LWDA does not agree with the findings, LWDA must issue a response in writing disputing the findings within twenty (20) business days. **Subject line of email must include: LWDA Disputes Programmatic Review PYXX (insert appropriate program year review date, i.e. PY19, PY20...).**
    - i) An email will be sent to LWDA acknowledging the request for review from WIOA Title I-B Field Operations Auditor. WIOA Title I-B Field Operations Auditor will provide a response within five (5) business days to the issuer to either uphold or overturn the items disputed by LWDA. Refer to addendum: *Workforce Innovation and Opportunity Act (WIOA) Title I-B Case Read Dispute Process*.
    - ii) If the findings are upheld, the LWDA must submit a response to address the deficiencies to the WIOA Title I-B Field Operations Auditor within 10 business days.
    - iii) If the finding(s) are overturned, in part or in their entirety, an adjusted closure letter will be issued by the WIOA Title I-B Field Operations Auditor. For any findings that were upheld, the LWDA must submit a response to address the deficiencies to the WIOA Title I-B Field Operations Auditor within 10 business days.

If LWDA, Chairman of the LWDB or Nineteen Tribal Nations Director does not respond within twenty (20) business days with an acceptance of the letter or dispute, a 2<sup>nd</sup> letter is sent requesting a response within ten (10) business days. If no response is received, a final letter will be issued by

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the WIOA Title I-B Field Operations Auditor stating that the review is closed. (*Note: A written assurance will be requested for issuance to the LWDA for failure to respond to the monitoring report.*)

- 3) **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) **No Findings and/or only observations** – a letter is emailed to the LWDA, with a copy to the Chairman of the LWDB or Nineteen Tribal Nations Director, indicating there were no findings. When only observations exist, it will be noted in the case review closure letter. No response is required/should be submitted for observations.

### VI. RECORDS

#### Monitoring Report Tracking

1. All Monitoring letters (schedule date, participant files request, AJC Profile, Case File Reviews and Closure Letter) will be saved in the LWDA's respective shared folders.
2. The assigned WIOA Field Operations Title I-B Auditor will be responsible for tracking the status of the respective LWDA's responses.
3. The WIOA Audit Supervisor will track the status of each review internally to ensure that the process meets required deadlines. The status of all monitoring reviews will be tracked on the WIOA Programmatic Monitoring Review Tracking Log.

#### File Format/Retention

1. All Monitoring Reviews materials will be kept in the WIOA Shared Folder.
2. All records pertaining to the monitoring review are available in the WIOA 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 LWDA's receiving WIOA Title I-B funds. (*Note: All records shall be maintained for a period of three (3) years.*)

### V. DISPUTE PROCESS

1. The WIOA Title I-B Field Operations Auditor must send the final monitoring report to the Local Workforce Development Area (LWDA) Director<sup>1</sup>. The Local Workforce Development Board
  - a. (LWDB) Chair, QAIA Audit Supervisor and the QAIA Audit Manager will be copied.
2. The LWDA will be given twenty (20) business days to review findings and identify any disputed items.
3. The LWDA must respond to the findings identifying each disputed item and the reason the item should not be counted as incorrect; including a policy or procedural reference to support their reasoning.
4. The WIOA Title I-B Field Operations Auditor must provide a written response within five (5) business days to uphold or overturn the disputed items in monitoring report.
  - a. If the WIOA Title I-B Field Operations Auditor notes an error was made in citing the disputed issue, the Auditor must overturn (vacate) the finding in the written response.
  - b. If the WIOA Title I-B Field Operations Auditor concludes the disputed issue is correctly

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<sup>1</sup> The LWDA is the direct services provider (Adult, Dislocated Worker (DW) and Youth Career Services)  
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cited, the Auditor will uphold the finding(s) in monitoring report. Please note, the QAIA Audit Supervisor must agree that there is merit to uphold the disputed item(s).

5. If the LWDA still does not agree with the QAIA Unit's decision to uphold finding(s), the item
  - a. may be elevated to the Workforce Policy Unit through the [TitleIPolicy@azdes.gov](mailto:TitleIPolicy@azdes.gov) mailbox
  - b. for review by the Workforce Policy Unit. The QAIA auditor and Supervisor must be copied on the dispute elevated to Policy.
6. The Workforce Policy Unit must provide a final decision to either uphold the WIOA Title I-B Field Operations Auditor's decision or overturn the finding.
7. The Workforce Policy Unit must issue a final ruling within seven (7) business days to the LWDA. The Local Workforce Development Board (LWDB) Chair, QAIA Audit Supervisor, the WIOA Title I-B Field Operations Auditor and the QAIA Audit Manager will be copied.