

Workforce Innovation and Opportunity Act (WIOA) Title I-B Program Programmatic Monitoring Review Procedures

Beginning each Program Year (July 1) the Quality Assurance and Integrity Administration (QAIA) 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.

1) 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. The notification will indicate that files and supporting documents must be uploaded in Arizona Job Connection (AJC). Except for disability documents, which must be sent by secure email to the WIOA mailbox QAWIOA@azdes.gov.
2. The second notification will be sent to LWDA identifying the list of participant files to be reviewed ten (10) business days prior to the review date.
3. Participant reports will be generated from the Tableau tool. Which pulls data from 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, outlined below in (Section 2. Preparing For The Review).
4. Notification must be sent to the LWDB Director, copying the following:
cc: QAIA Audit Manager
QAIA Audit Supervisor
QAIA Audit Administrator
LWDB Chair

2) 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 QAIA Auditor. Auditors will review and prepare the following in the week prior to the monitoring:

1. Generate WIOA Tableau Enrollment and Case Management Reports.
2. Review AJC—participants' application, activities, and case notes, etc. (Program Details page, Enrollment page, Demographics page, Service & Training Plan, Annual report and Measurable Skills Gain page).

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Generating Participant Cases for Review

1. **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.
 - a. Tableau participant date range (Participated Between) July 1st through June 30th of the current program year.
2. **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:
 - a. 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*).

3) Completing The Case Review Monitoring Report

Compiling of Review Data

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

1. Findings
2. Observations
3. Procedural Issues

Case Review Monitoring Report

The draft monitoring report will be completed by the QAIA Auditor upon completion of the review and sent to the QAIA Audit Supervisor for review and approval within ten (10) business days.

The supervisor will review the draft report within ten (10) business days. If approved, the report is returned to the auditor and the auditor will send the report to the LWDA, copying the following:

cc: QAIA Audit Manager
QAIA Audit Supervisor
QAIA Audit Administrator
QAIA Audit Coordinator
Program Oversight and Support Administration (POSA)
LWDB Chair

Failure to Respond

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.

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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 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 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 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 QAIA 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 the QAIA Auditor. The QAIA Auditor will provide a response within five (5) business days to the issuer to either uphold or overturn the items disputed by LWDA.

If the findings are upheld, the LWDA must submit a response to address the deficiencies to the QAIA Auditor within 10 business days.

- ii. If the finding(s) are overturned, in part or in their entirety, an adjusted monitoring letter will be issued by the QAIA Auditor. For any findings that were upheld, the LWDA must submit a response to address the deficiencies to the QAIA Auditor within 10 business days.

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

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.

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3. **No Findings and/or only observations** – a letter is emailed to the LWDA, with a copy to the Chairman of the LWDB, 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.

4) Records

Monitoring Report Tracking

1. All Monitoring letters (schedule date, participant files request, case file reviews and closure letter) will be saved in the LWDA's respective shared folders.
2. The assigned QAIA 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).*

5) Dispute Process

The Quality Assurance Integrity Administration (QAIA) Auditor and Audit Supervisor will review the LWDA's response to the disputed finding(s). QAIA will provide a written response on the monitoring report as follows:

1. The auditor must provide a written response within ten (10) business days to uphold or overturn the disputed items in the monitoring report.
 - a. If the auditor notes an error was made in citing the disputed issue, the auditor must overturn (vacate) the finding in the written response.
 - The auditor must remove the overturned finding from the monitoring report. The revised monitoring report will be issued to the LWDA when the closure letter is sent.
 - b. If the auditor concludes the disputed issue is correctly cited, the auditor will uphold the finding(s) in the monitoring report. Please note, the audit supervisor must agree that there is merit to uphold the disputed item(s).
 - Upheld finding will be returned to the LWDA for a final response.

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2. If the LWDA agrees with QAIA's decision to uphold the noted finding(s). The LWDA must provide a resolution, the missing source documentation (if applicable) and correct the finding.
 - a. If the finding cannot be corrected, a case note must be entered in AJC addressing the error and noted in their written response.
 - b. The LWDA will respond to the monitoring report to QAIA within (10) business days.
 - c. Upon receipt QAIA will review the LWDA response. QAIA will ensure finding(s) have been corrected and issue a closure letter.
3. If the LWDA still does not agree with QAIA's decision to uphold finding(s), the item(s) may be elevated to the Workforce Policy Unit through the titleipolicy@azdes.gov mailbox for review by the Workforce Policy Unit. The QAIA auditor and supervisor must be copied on the dispute elevated to Policy, including the Program Oversight and Support Administration mailbox at wioaprogram@azdes.gov.
4. The Workforce Policy Unit must provide a final decision to either uphold the QAIA Auditors decision or overturn the finding.
5. The Workforce Policy Unit must issue a final ruling within ten (10) business days to the Local Workforce Development Area (LWDA) Director, coping the following.

cc: QAIA Audit Manager
QAIA Audit Supervisor
QAIA Audit Administrator
QAIA Audit Coordinator
Program Oversight and Support Administration (POSA)
LWDB Chair
6. Upon receipt of the final ruling from the Workforce Policy Unit, QAIA will issue a closure letter to the LWDA.
 - a. Upheld finding(s) must be addressed by the LWDA within ten (10) business days from the final ruling. The LWDA must provide a resolution, the missing source documentation (if applicable) and correct or address the finding(s).
 - b. The LWDA will provide their written response to the auditor within ten (10) business days.
 - c. The QAIA will validate the corrections and issue a closure letter within (5) business days from the LWDA's response.
 - d. If the finding(s) are overturned, in part or in their entirety, an adjusted monitoring letter will be issued by the QAIA Auditor and sent with the closure letter.
 - e. 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 letter.