

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) TITLE IB PROGRAM OPERATIONS MONITORING REVIEW PROCEDURES

At the beginning of each Program Year (July 1st), the WIOA Title IB Field Operations Auditor sends an introduction letter to the ARIZONA@WORK Local Workforce Development Areas (LWDAs) and Tribal Area Entities providing them an update on the coming year's monitoring process and activities. The letter conveys the Program Auditor's LWDA's assignment and the following options; to upload the files into the Arizona Job Connection (AJC) system, scan the documents and/or send them directly to the Auditor's e-mail as an encrypted message or the conventional onsite visit. The reviews will be scheduled between the months of September through June for the identified program year.

SCHEDULING THE REVIEW

- E-mail notification of intended monitoring dates will be issued to the LWDA and/or Tribal Entity a minimum of sixty (60) days prior to the proposed on-site visit.
- A confirmation letter is sent by the Field Operations Title IB Field Auditor, ten (10) days prior to the review, to the ARIZONA@WORK LWDA and/or Tribal Area Entity Director, confirming the monitoring review date, time and includes requests for local policies, procedures, Youth expenditures, etc.
- Should the ARIZONA@WORK LWDA and/or Tribal Entity choose to upload or e-mail the files, follow same process as above and confirm the date the files need to be uploaded and/or e-mailed to the auditor.
- Monitoring Review dates will only be rescheduled due to extenuating circumstances and the ARIZONA@WORK LWDA's and/or Tribal Area Entity must contact the Title IB Field Operations Auditor one (1) month prior to the scheduled date or as soon as possible.

PREPARING FOR THE REVIEW

Desk Review

The desk review and file records preparation must be completed no later than two (2) business days prior to the on-site review by the Title IB Field Operations Auditor. The completed file review is observed by the WIOA Title IB, QAIA Audit Manager prior to conducting the on-site review.

1) Auditors Preparation week prior to Monitoring:

- Review LWDA plan
- Review prior year Monitoring Report
- Review for submittal /update of policies and procedures
- Review, generate and/or request the following reports:

WIOA Reports - Management Reports

No Participation-LWDA
Query 5% Additional Assistance List
for area to be reviewed
5% Over Income Report for area to be reviewed

Case Management Reports

Out-of-School Youth
In-School Youth Query

Adult & Dislocated Worker Queries
LWDA Annual Report
LWDA Performance Report-
Credentials

2) Preparing for Case Reviews

- **AJC Reports** – Generate participant reports for each WIOA Title IB program funding stream (Adult, Dislocated Worker, In-School Youth and Out-of-School Youth) to identify and select the active and exit participant files.

- **Selection of Participant Files** - Obtain the list of participant files from AJC to select for case reviews. The selection of participant files is as follows.

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.

Review the LWDA's and/or Tribal Entity's previous year file selection to ensure no duplication for current year.

- **AJC Participant Printouts** – Generate print outs of participants/application, activities and case notes, etc. (Program Details page, Enrollment page, Demographics page, Service & Training Plan, Annual report - Measurable Skills Gain page).

3) Preparing for the On-Site Review

- Reserve the vehicle by contacting the vehicle steward within five (5) days prior to review, and/or as soon as the date of the review has been secured, whichever is first.
- Complete itinerary two (2) business days prior to review and send to WIOA Title IB QAIA, Audit Manager.
- Complete the agenda (2) business days prior to review and send to WIOA Title IB QAIA, Audit Manager.

ON-SITE REVIEW PROCESS

Entrance Interview

An entrance interview is scheduled on the first day of the Monitoring Review with a representative (s) of the LWDA and/or Tribal Entity. The WIOA Title IB Field Operations Auditor will:

- Begin the meeting with the agenda items selected
- Identify the Monitoring Review process
- Review - Address questions, clarifications from the “WIOA Title I-B Program Monitoring Guide.”
- Discuss the following Management reports (ISY 5% additional assistance, 5% Over Income and No Participation Report)
- Review the LWDA/Tribal Entity Policies for any updates to WIOA Title IB and/or recent modifications
- Identify how the LWDA/Tribal Entity are Tracking their Performance Measures
- Discuss best practices
- Request interviews with participants (one youth and one adult or staff)
- Provide the LWDA/Tribal Entity the Technical Assistance Q & A e-mail address
- Exit interview date

Case Reviews

- Account for all participant files requested to be reviewed
- Complete review of selected files
- Identify potential findings interviews
- Conduct when possible: interviews with LWDA/Tribal Entity participants, supervisor and staff (*by phone or in person*).

Exit Interview

An exit interview will be conducted with a representative (s) of the LWDA and/or Tribal Entity at the conclusion of the review. It will include:

- Preliminary discussion of potential findings, if time allows.
- Exit Interview (if time allows). This can also be completed via telephone.
- If there are any technical assistance requests, advise the ARIZONA@WORK Local/Tribal Entity to send it to Policy Q&A, cc: Field Operations Auditor.
- Any other business
- *(Note: Not all findings may be identified at the time of the exit conference. They may be determined upon completion of the evaluation and research of issues identified at the end of review process.)*

COMPLETING THE MONITORING REPORT

Compiling of Review Data

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

- Findings
- Observations
- Appropriate Citations, Policies
- Policies and Procedure Issues
- Areas of Concern

Cover Letter & Monitoring Report

The ***draft*** cover letter and monitoring report will be completed by the WIOA Title IB Field Operations Auditor upon return from the on-site review and sent to the WIOA Title IB, QAIA, Audit Manager for review and approval. The final report will be issued to the LWDA and /or Tribal Entity within ten (10) business days following the Field Operations Title IB Auditor's return to the office.

Receipt of Response

Upon receipt of the LWDA and/or Tribal Entity response, the WIOA Title IB Field Operations Auditor will review document for compliance.

- 1) **Findings** – The monitoring report identifying the specific *findings* and areas of concern will be sent to the ARIZONA@WORK LWDA and/or Tribal Director. The LWDA and/or Tribal entity is provided Twenty (20) business days from the date of receipt of the monitoring report to respond.
- If the LWDA and/or Tribal entity monitoring response does not meet compliance identified in the monitoring report, a letter will be sent to the LWDA and/or Tribal entity within five (5) business days from receipt of response requesting further action to be taken.

- If the monitoring response provided meets compliance, a closure letter will be sent to the ARIZONA@WORK LWDA and/or Tribal Entity within five (5) business days from receipt of response, with a copy to the LWDB Chairman.
 - If a written response is not received within twenty (20) business days, a letter is sent to the ARIZONA@WORK LWDA and/or Tribal Entity requesting a response within ten (10) business days. *(Note: A Written Assurance will be sent to the LWDA and/or Tribal Entity for failure to respond to the monitoring report.)*
- 2) **No Findings** – a letter is mailed to the ARIZONA@WORK LWDA and/or Tribal Director, with a copy to the Chairman of the LWDB, indicating *no findings* identified during the review and the review is closed.
- 3) **Observations** - Observations are provided as a courtesy and do not carry the force of Findings. These are simply 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, simply a means to improve performance going forward. Corrections are not required for Observations.

Monitoring Report Tracking

- All Monitoring letters (Schedule date, participant files request, AJC Profile, Case File Reviews, findings/no findings, Closure Letter) need to be saved in the WIOA LWDA's respective shared folder.
- The assigned WIOA Field Operations Title IB Auditor will be responsible for tracking the status of the respective LWDA and/or Tribal Entity responses.
- The WIOA Title IB, QAIA, Audit Manager 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 Schedule.
- The goal is to resolve all outstanding issues within six months of the date of the exit interview. However, there are times when extenuating circumstances (*i.e., seeking guidance from DOL or an item requires LWDB action, etc.*) that can delay the resolution. In those instances, the review file must document the actions taken to resolve any outstanding issues and additional documentation is entered into the WIOA Programmatic Monitoring Review Schedule.

File Format/Retention

- All Monitoring Reviews materials will be kept in a six (6) part file per *WIOA Title IB Program File Set-Up*.
- A *WIOA Title IB Program File Log* is comprised and inserted in the respective participant file with the dates of actions completed.
- For the purpose of this document “records” are defined as all programmatic and fiscal hard-copy and *electronic documents* that pertain to participants and employees. Some LWDA's have adopted e-files which must be kept for 3 years in accordance with all other *WIOA Title IB Program File Set-Up* requirements.
- All records pertaining to the monitoring review are available in the WIOA Section for review by DOL, Audit Management Services and Auditor General's Office for federal oversight of the State's monitoring responsibilities for Arizona's LWDA's and Tribal Area Entities receiving WIOA Title IB funds. *(Note: All records shall be maintained for a period of three (3) years)*