

Workforce Innovation and Opportunity Act (WIOA) Rapid Response Monitoring Review Procedures

Beginning each Calendar Year (January 1) an auditor with the Quality Assurance and Integrity Administration (QAIA) will send an introduction letter to the Local Area Rapid Response Coordinator from each Local Workforce Development Areas (LWDA's), to provide an update on the coming year's monitoring process and requirements. The reviews will be scheduled quarterly, areas chosen will be dependent on the Rapid Response events that transpired for the quarter under review.

1. Desk Review Process

Scheduling the Desk Review

1. As part of the review process, local area Rapid Response policies and procedures will be requested from all LWDA's on an annual basis in order to have the most recent Rapid Response policies and procedures from each area, even if the area is not chosen for an event review.
2. The desk review will focus on a specific event from the preceding quarter. When an event is chosen, an email notification will be sent to the Local Area Rapid Response Coordinator, with a copy to those listed below, a minimum of thirty (30) days prior to a desk audit notifying them that files and supporting documents must be uploaded in Arizona Job Connections (AJC) and sent to the auditor via e-mail. The auditor will provide a start date for review of the files.
 - 2.1. Supporting documents may include:
 - 2.1.1. E-mail communications related to the event(s) under review
 - 2.1.2. Any other documentation related to the event(s) under review that is not uploaded to AJC
 - 2.1.3. If applicable, revised local policies and/or procedures changed after the original request for local policies and procedures made and submitted at the beginning of the year
3. The second notification will be sent to the Local Area Rapid Response Coordinator, with a copy to those listed below, identifying the participants or events to be reviewed ten (10) business days prior to the review date.
4. Rapid Response reports will be provided to the auditor by the State Rapid Response Coordinator.

cc:

QAIA Administrator
State Rapid Response Coordinator at azrapidresponse@azdes.gov
Director of the Local Workforce Development Board (LWDB)

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 Quality Assurance and Integrity (QAIA) auditor. The auditor will review and/or prepare the following in the week prior to the monitoring:

1. Obtain latest WARN data from the State Rapid Response Coordinator.
2. Select one event from three different areas that transpired in the previous quarter to review, for a total of three events within a review period.

Generating Rapid Response Cases for Review

1. **Review Rapid Response data** – Obtained via the State Rapid Response Coordinator.
2. **Selection of Rapid Response Events**
 - a. Three (3) Rapid Response events will be selected from the previous quarter to review. Each event selected will be from a different Local Workforce Development Area.
3. **Cross-check participants in each selected event to ensure they are or were not already part of the Programmatic Monitoring.** If the participant has already been selected for Programmatic Monitoring, another participant will be chosen from the same Rapid Response event.

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
4. Best Practices

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 Administrator for review/approval within thirty (30) business days.

The QAIA Administrator 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 Local Area Rapid Response Coordinator, copying the following:

cc:

QAIA Administrator
State Rapid Response Coordinator at azrapidresponse@azdes.gov
Director of the Local Workforce Development Board (LWDB)

Failure to respond to correspondence

Desk reviews are deemed non-compliant if the Local Area Rapid Response Coordinator fails to respond to notifications. A second request will be issued allowing them 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 Rapid Response Desk Audit. A letter will be sent stating the review is closed due to non-compliance.

How to Respond to Monitoring Report:

The QAIA auditor will issue the monitoring report identifying the specific findings and areas of concern via email to the Local Area Rapid Response Coordinator with a copy to the Employment Service Program Manager, the LWDB Director, the State Rapid Response

Coordinator, and the QAIA Administrator.

1. **Findings** – The Local Area Rapid Response Coordinator is provided ten (10) business days from the date of issuance of the monitoring report to respond.
 - 1.1. If the monitoring report does not meet compliance, a findings letter will be issued. If the Local Area Rapid Response Coordinator agrees with the findings, a response to address the deficiencies must be submitted to the QAIA auditor within ten (10) business days.
 - 1.2. If the Local Area Rapid Response Coordinator does not agree with the findings, the Local Area Rapid Response Coordinator must issue a response in writing disputing the findings within ten (10) business days. ***Subject line of email must include: Rapid Response Disputes Review PYXX Quarter X (insert appropriate program year review date and quarter, i.e. PY19 Quarter 1, PY20 Quarter 2...).***
 - 1.2.1. An email will be sent to the Local Area Rapid Response Coordinator 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 the Local Area Rapid Response Coordinator. Refer to addendum: Rapid Response Case Read Dispute Process.
 - 1.2.2. If the findings are upheld, the Local Area Rapid Response Coordinator must submit a response to address the deficiencies to the QAIA auditor within 10 business days.
 - 1.2.3. If the finding(s) are overturned, in part or in their entirety, an adjusted closure letter will be issued by the QAIA auditor. For any findings that were upheld, the Local Area Rapid Response Coordinator must submit a response to address the deficiencies to the QAIA auditor within 10 business days.

If the Local Area Rapid Response Coordinator does not respond within ten (10) 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 Rapid Response Coordinator and Local Area Rapid Response Coordinator 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.
3. **No Findings and/or only observations** – A letter is emailed to the Local Area Rapid Response Coordinator, with a copy to the Employment Service Program Manager, and LWDB 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.

4. 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 Rapid Response Monitoring shared folders.
2. The QAIA auditor will be responsible for tracking the status of the respective LWDA's responses.
3. The QAIA auditor 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 Rapid Response Monitoring Review Tracking Log.

File Format/Retention

1. All Monitoring Reviews materials will be kept in the Rapid Response Monitoring Shared Folder located on Google Drive.
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 Rapid Response funds. *(Note: All records shall be maintained for a period of three (3) years.*

5. Dispute Process

1. The QAIA auditor must send the final monitoring report to the Local Area Rapid Response Coordinator. The Local Workforce Development Area (LWDA) Director, QAIA Administrator and the State Rapid Response Coordinator will be copied.
2. The Local Area Rapid Response Coordinator will be given ten (10) business days to review findings and identify any disputed items.
3. The Local Area Rapid Response Coordinator 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 QAIA auditor must provide a written response within five (5) business days to uphold or overturn the disputed items in the monitoring report.
 - 4.1. If the QAIA auditor notes an error was made in citing the disputed issue, the auditor must overturn (vacate) the finding in the written response.
 - 4.2. If the QAIA auditor concludes the disputed issue is correctly cited, the auditor will uphold the finding(s) in the monitoring report. Please note, the QAIA Audit Supervisor must agree that there is merit to uphold the disputed item(s).
5. If the Local Area Rapid Response Coordinator still does not agree with the QAIA Unit's decision to uphold finding(s), the item may be elevated to the Title I Policy Unit through the TitleIPolicy@azdes.gov mailbox for review by the Title I Policy Unit. The QAIA auditor and Supervisor must be copied on the dispute elevated to Policy.

6. The Title I Policy Unit must provide a final decision to either uphold the QAIA auditor's decision or overturn the finding.
7. The Title I Policy Unit must issue a final ruling within seven (7) business days to the Local Area Rapid Response Coordinator. The QAIA Administrator, the QAIA auditor and the QAIA Audit Manager, and the State Rapid Response Coordinator will be copied.

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