

Chapter 1300	Monitoring and Data Validation: Adult, Dislocated Worker, Youth Programs One Stop Operator Training Providers/Contractors
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1301 BACKGROUND

This section establishes Pinal County Workforce Development Board policy regarding the oversight responsibilities as outlined in authorized legislation and state policy as well as the terms in any Intergovernmental Agreement or contract entered into on behalf of the Pinal County Workforce Development Area for ARIZONA@WORK Pinal County Adult, Dislocated Worker, Youth Program activities as well as the One Stop Operator.

This policy will to ensure that:

- A. Adult, Dislocated Worker and Youth Programs and services are operated in compliance with WIOA and applicable Federal, State rules and regulations and Pinal County Workforce Development Board Policies and Procedures;
- B. Services and training are being provided to participants as described in the agreement document;
- C. The appropriate verification of eligibility for enrollment of participants is uploaded into the AJC System. See the ARIZONA@WORK WIOA Title I-B Adult and Dislocated Worker Programs policy, sections 205.1 and 205.2, Youth Program policy, sections 506.1 and 506.2, the WIOA Title I-B Adult Worker Eligibility Checklist, WIOA Title I-B Dislocated Worker Checklist and the WIOA Title I-B Youth Program Checklist;
- D. The appropriate verification documents for data validation is uploaded into the AJC System. See the Arizona Department of Economic Security WIOA Title I-B Data Validation policy and the WIOA Title I-B Adult/ Dislocated Worker/ Youth Data Validation Checklist;
- E. The appropriate documentation for basic career services, individualized career services, training services, supportive services and business services is uploaded into the AJC system, unless uploading into system is not available;
- F. Effective Equal Employment Opportunity (EEO) guidelines are used in program design and operation;

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- G. Tangible outcomes are accomplished at costs which are in line with original proposed costs;
- H. Fiscal integrity is insured and auditable records are maintained;
- I. Eligible Training Providers conform to federal, state and local policies; and
- J. The One Stop Operator is fulfilling its contractual obligations.

1302 AUTHORITY

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128)
- Code of Federal Register 20 Part 683.410
- Code of Federal Register (Uniform Guidance) 2 Part 200
- Training and Employment Guidance Letter No. 19-16
- Training and Employment Guidance Letter No. 21-16
- Training and Employment Guidance Letter No. 10-16, Change 1
- Training and Employment Guidance Letter No. 7-18
- Training and Employment Guidance Letter No 23-19
- Workforce Arizona Council Policy 07 “ARIZONA@WORK WIOA Statewide Monitoring Policy”
- Arizona Department of Economic Security WIOA Policy and Procedure Manual

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1303 DEFINITIONS

- Observation: May be a concern, weakness or flaw in administrative or management practices and/or performance expectations which, at the time of the review did not rise to the level of a finding. In many instances an observation if left unaddressed could result in performance or compliance problems and/or finding in the future.
- Findings: Denotes non-compliance with laws, regulations and grant agreements and program policies (state and/or local) and require immediate attention and corrective action.
- Repeat Finding: Denotes that the finding is similar or essentially the same as a finding which appeared in a previous comprehensive monitoring report, including unresolved findings from that report.

1304 SUBRECIPIENT DETERMINATION

Per Uniform Guidance, 200.330 “sub recipient” means a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program. Characteristics which support the classification of an entity as a sub recipient include when the entity:

- A. Determines who is eligible to receive what Federal assistance;
- B. Has its performance measured in relation to whether objectives of a Federal program were met;
- C. Has responsibility for programmatic decision-making;
- D. Has responsibility for adherence to applicable Federal program requirements specified in the award; and
- E. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute.

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1305 CONDUCTING MONITORING REVIEWS

A. Adult, Dislocated Worker, Youth Programs

For monitoring of client files, a minimum two client files per WIOA Title I-B Adult, Dislocated Worker and Youth Program during the period of July-April of each program year.

The client files will be for participants served during the current program year, who are either currently being served or who have exited during the current program year. All required documents must be uploaded into the AJC system. PCWDB will not accept any additional documents sent via email.

All programmatic monitoring will be conducted via a desk review. This does not preclude a site visit to a sub recipient's administrative offices, if warranted.

Monitoring reviews may include the following:

1. Reviews utilizing access to participant and operational records, including records stored in the State's case management and reporting system. Such reviews will consist of assessing the following:
 - a. Thoroughness accuracy, timeliness of information entered into the system, including career, individualized career services, training services, supportive services, follow-up services and business services;
 - b. Detail of case notes;
 - c. Documents uploaded into the system, including eligibility and data validation documentation, and required documents such as Individual Employment Plans, Individual Service Strategies, Individual Training Account Plan, work-based training contracts and time sheets, work experience contracts and timesheets, and supportive service documentation;

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2. In addition to the review of the AJC System the following may be reviewed:
 - a. Agency Administration;
 - b. Program Performance;
 - c. Data reports pertaining to program activity and AJC System documents and Tableau Reports;
 - d. Equal Employment and Nondiscrimination; and
 - e. Training services, including use of the Eligible Training Provider List and Work-based Training contracts, such as incumbent worker training, customized training, On-the-Job training contracts, and work experience contracts.

3. Participant and staff interviews

The PCWDB may request the scheduling of interviews with selected program participants. These interviews may consist of but not be limited to the following topics:

- a. Professionalism of staff serving the participant;
- b. Knowledge of program staff in providing career guidance;
- c. Expectations of program versus actual services provided; and
- d. Overall satisfaction of program experience

B. One Stop Operator

1. The One Stop Operator will be subject to an annual review by the PCWDB utilizing the contracted Statement of Work as the basis for such review.

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2. The One Stop Operator will also be held accountable for the performance metrics agreed to by the PCWDB.
3. The PCWDB will develop monitoring tools to be used for this purpose.

1306 ADULT, DISLOCATED WORKER AND YOUTH MONITORING PROCEDURES

Monitoring of the Adult, Dislocated Worker and Youth Programs will be conducted by Pinal County Workforce Development Board (PCWDB) staff, under the guidance of the PCWDB Executive Committee, and Youth Committee, on a monthly basis July through April of each program year.

- A. During the month, PCWDB staff will review the case files in the AJC System.
- B. PCWDB staff will meet with the service providers to discuss any concerns, and provide the service provider opportunity to address concerns and make corrections in the AJC system. The service provider must advise PCWDB staff when all corrections have been made. All corrections must be addressed within 14 business days of the meeting.
- C. On a quarterly basis (for quarters ending September 30, December 31 and March 31), PCWDB will send a letter to the service providers summarizing re-occurring concerns that may be considered observations or findings. Re-occurring concerns must be addressed within 30 business days or they will likely be included in the annual Monitoring Report.

1307 MONITOR REPORT

No later than May 31 of each program year, PCWDB staff will send the service provider an official Monitoring Report that lists concerns discovered during the program year. The report will summarize the quarterly reviews for that program year.

Observations and/or Finding that are unresolved at this time will identified in the Monitoring Report. Observations and Findings must be addressed by the sub

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recipient through a Corrective Action Plan.

A. The PCWDB staff will transmit Monitoring Report of findings, observations and required actions, to the sub recipient. The report will include the following information:

1. Name of sub recipient/training provider;
2. Agreement number(s) or other reference if applicable;
3. Summary of program year accomplishments and best practices;
4. Summary of concerns from Monthly monitoring reviews (adult, Dislocated Worker, and Youth Programs only);
5. Findings, Observations, Recommendations and Required Actions;
6. Time frames for corrective actions; and
7. Due date for response.

B. An electronic monitoring file will be maintained for each sub recipient, which will contain monitoring reports and follow-up documents, as well as the worksheets, questionnaires, and other back-up information used in the monitoring. Records will be retained per the State WIOA Record Retention policy.

1308 STEPS TO CLOSURE

- A. Sub recipients with open findings identified in the Monitoring Report (see Section 1307) will have 30 calendar days after receipt of the report to address the findings in writing and present a corrective action plan addressing the required actions outlined in the Monitoring Report utilizing the “[Monitoring Review Corrective Action Plan](#)” form (**Exhibit A**).
- B. The sub recipient will submit updated action to the PCWDB on a monthly basis until all items are completed and accepted by the PCWDB.

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- C. Upon acceptance of the corrective action plan from the sub recipient, the PCWDB will issue a final close-out report within 30 calendar days.
- D. Failure of the sub recipient to address all outstanding items identified in the [Monitoring Review Corrective Action Plan](#)” within the agreed upon timeframes, could result in further recommended action as determined by the PCWDB up to and including termination of the contractual agreement.

1309 ELIGIBLE TRAINING PROVIDER MONITORING REVIEWS

- A. The PCWDB staff will conduct monitoring reviews of the training providers approved on the ARIZONA@WORK Pinal County Eligible Training Provider List (ETPL - <https://www.azjobconnection.gov/ada/r/training>).
- B. The PCWDB will conduct eligible training provider monitoring in accordance with State issued policy as posted in the Arizona Department of Economic Security WIOA Policy and Procedure Manual Section 612 “MONITORING OF TRAINING PROVIDERS”.

1310 TRAINING CONTRACTORS

- A. Sub recipients will be held accountable for the contracting and monitoring of such contracts of training contractors. Monitoring of training contractors may take place in the form of desk reviews and/or on-site reviews.
- B. Sub recipients will ensure that the contractor is in compliance with the terms, conditions, and specifications of their contract. The PCWDB reserves the right to also perform on-site monitoring when warranted.

1. Desk Review

A desk review may include:

- a. Compliance with the terms, conditions and specifications of the

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agreement;

- b. Invoices;
- c. Client progress reports;
- d. Participant surveys;
- e. Credentials and certificates of completion;
- f. Measurable Skills Gains;
- g. Summary of participant performance data; and
- h. Career Planner feedback.

2. On-site Review

On-site reviews may utilize standard monitoring instruments covering the following, as applicable:

- a. Agency administration;
- b. Program management;
- c. Fiscal management;
- d. Participant files;

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- e. Classroom training;
- f. Participant interviews;
- g. Equal Employment and Nondiscrimination; and
- h. Worksite/internship/externship monitoring.

1311 CONFIDENTIALITY, DATA AND RETENTION

- A. All PCWDB staff and sub recipient staff participating in monitoring activities will protect the confidentiality of all personally identifiable information (PII) contained in the client files. This includes any third party monitoring such as Single Audits conducted on behalf of the local workforce development area or sub recipient.
- B. All requisite Data Sharing Agreements must be in place and current at the time of any monitoring review.
- C. All written reports and other documentation pertaining to monitoring and other oversight activities will be made available for review by the PCWDB, Federal, State and County officials.
- D. Reports and other records of monitoring activities must be retained for three years from the date of submission of the final expenditure reports regarding the funding sources monitored. If any litigation, claim, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion and resolution of all such actions or until the end of the three year period, whichever is later.