


City of Alexandria, Virginia

MEMORANDUM

DATE: NOVEMBER 21, 2023

TO: KATE GARVEY, INTERIM DEPUTY CITY MANAGER

FROM: ROBERT SNYDER, CHIEF INTERNAL AUDITOR 

THROUGH: KUSH PATEL, INTERNAL AUDITOR

SUBJECT: DCHS WIOA PROGRAM COMPLIANCE REVIEW – PROGRAM YEAR 2022

Background

The City of Alexandria in conjunction with Arlington County run the Workforce Innovation and Opportunity Act (WIOA). WIOA operates job centers and provides job search assistance and training opportunities enhancing worker employment prospects. It is the Alexandria/Arlington Workforce Council's (AARWC) responsibility to oversee the job centers and must conduct monitoring and oversight actions according to the provisions of the WIOA. The WIOA Act of 2014 mandates the monitoring of recipients and sub-recipients for all grants awarded and funds expended under WIOA Title I to determine compliance with WIOA, the Uniform Administrative Requirements at 2 CFR Part 200, and other applicable Federal laws and regulations. Because the Virginia Community College System (VCCS) is the local WIOA Title I administrative entity they conduct the required annual compliance monitoring.

Summary

From April 17-19, 2023 The VCCS completed a monitoring review of our WIOA grant. And on July 13th, 2023 the VCCS issued Alexandria and Arlington County the annual compliance review for program year 2022. In the review the VCCS issued four (4) findings each with required actions, four (4) concerns each with required actions, and one (1) consideration that does not have a required action. The AARWC was required to complete a corrective action plan (CAP) for all of the required findings. On October 30, 2023 the Data Administrator for the WIOA Council submitted the final changes on the CAP to the VCCS and on November 3rd, 2023 the Workforce Compliance Monitor for VCCS confirmed that all of the corrective actions had been met and that the CAP would be closed out. In addition to the confirmation from VCCS, Alexandria's Office of Internal Audit also reviewed the CAP and noted that AARWC has completed all required actions related to the findings in the monitoring review.

Based on our verification of the completion of the CAP by AARWC as well as the notification by VCCS that the CAP has been approved we conclude that this engagement has been fully completed. If you have any questions please contact Office of Internal Audit at internalaudit@alexandriava.gov.



11/15/2023

David Remick
Executive Director
2100 Washington Blvd, 1st Floor
Arlington, VA 22204

RE: PY 2022 Corrective Action Plan (CAP) Status
Dear Mr. Remick

During the month of April 2023, the Virginia Community College WIOA Title I Monitoring Team conducted a comprehensive review of the following grants and programs awarded to/implemented by Alexandria/Arlington Regional Workforce Council.

- WIOA Title I Adult, Dislocated Worker, and Youth Formula Programs

The review resulted in four findings and two concerns that require corrective action. The VCCS WIOA Title I Monitoring Team received the Alexandria/Arlington Regional Workforce Council's response. All required actions have been completed, and no additional response is required.

Sincerely,

Beverly W. Suthers
Workforce Compliance Monitor
Virginia Community College System
300 Arboretum Place, Suite 350
Richmond, VA 23236

Finding 1: *Contract Provisions*

Issue: One-Stop Operator Modification did not contain the correct “Buy American” Clause

Corrective Action: The AARWC must ensure that future Requests for Proposal (RFPs) and contracts over the simplified acquisition threshold include the Buy American Clause as required by federal regulations.

LWDB Response: All file corrections have been completed. Documents have been uploaded and errors have been noted for training. Staff have been trained and a new program design has been implemented.

VCCS Evaluation: STATUS - CLOSED

The VCCS reviewed the LWDB’s corrective action plan. The VCCS has determined that the LWDB has satisfied the requirements of the corrective action and considers this finding closed.

Finding 2: *Work Experience*

Issue: The Work Experience (WEX) agreements did not include the outline of the academic and occupational education components to be learned or the structure and amounts of incentives to be earned.

Corrective Action: The AARWC must provide a written statement explaining why academic and occupational education was not provided in conjunction with work experience. The AARWC must revise its worksite agreement to ensure it clearly identifies both the rate of pay and the academic and occupational education components, how the components will be provided, and by whom. The AARWC shall update the WIOA Youth Work Experience Policy to include the structure and the amounts of incentives provided for participation in the activity. The AARWC shall also ensure staff receive training on developing work experience academic and educational components. Documentation of these actions must be provided to the VCCS WIOA Title I monitoring team for review.

LWDB Response: AARWC modified worksite agreement template and will share the template with VCCS for approval. Once approved, the template will be used going forward.

VCCS Evaluation: STATUS - CLOSED

The VCCS reviewed the LWDB’s corrective action plan. The VCCS has determined that the LWDB has satisfied the requirements of the corrective action and considers this finding closed.

Finding 3: Youth Assessments

Issue: A review of the electronic records shows that several of the records were assessed for basic skills level in reading, writing, and math using a Career Scope. The Career Scope assessment does not address comprehensive math, language, and reading skills in the same way as approved standardized assessments such as TABE, ABLE, and CASAS.

Corrective Action: The AARWC must utilize an approved assessment of basic academic skills levels for determining if participants are basic skills deficient. The AARWC must train staff on how to use the assessments with participants.

LWDB Response: To ensure adherence to standard assessment practices and eliminate potential misconceptions in the future, we have reiterated the importance of using approved standardized assessments such as TABE, ABLE, and CASAS among our case managers, as well as a thorough review of TEGL 21-16 and 20 CFR § 681.290. We are also taking steps to ensure continuity and clarity of communication even in the event of staff changes. Staff training has been completed.

VCCS Evaluation: STATUS – CLOSED

The VCCS reviewed the LWDB's corrective action plan. The VCCS has determined that the LWDB has satisfied the requirements of the corrective action and considers this finding closed.

Finding 4: VaWC Records Management

Issue: VaWC Records

Corrective Action: Review cases identified in Attachment A, make corrections to the active participant records, upload missing documentation, delete or redact medical information documents from the VaWC case notes, provide training on expectations related to the use of the VaWC training module, document uploads, and services.

LWDB Response: All file corrections have been completed. Documents have been uploaded and errors have been noted for best practices to avoid in the future. Completed. Medical information that violated privacy has been deleted and best practice for documentation purposes was included on the training. Completed. A secondary system of uploads to SharePoint is no longer used for participant records and active paper file participants have been uploaded to VaWC. Staff have been trained and new program design has been implemented to reduce staff turnover resulting in errors.

VCCS Evaluation: STATUS - CLOSED

The VCCS reviewed the LWDB's corrective action plan. The VCCS has determined that the LWDB has satisfied the requirements of the corrective action and considers this finding closed.

Concern A: *WIOA 40% Adult and Dislocated Worker Training Expenditure Requirement*

Issue: The AARWC did not meet the 40% training expenditure requirement in PY20 and may not be on track to meet the training expenditure requirement for PY21.

Corrective Action: The AARWC shall provide the WIOA Title I Monitoring team with a written plan describing how they will meet the 40% training expenditure requirements moving forward. The LWDA will meet with the Programs Team monthly to review and assess activities identified to achieve the 40% requirement under the action plan.

LWDB Response: The LWDA has provided a written plan to meet the 40% training requirement for Adult/DLW.

VCCS Evaluation: STATUS - CLOSED

The VCCS reviewed the LWDB's corrective action plan. The VCCS has determined that the LWDB has satisfied the requirements of the corrective action and considers this finding closed.

Concern C: *Equal Opportunity (EO) Rights and Grievance Resolution Policy*

Issue: A review of the following policy was conducted and several items were noted that need to be addressed for modifications. The items are an area of concern as local area policies shall reflect federal regulations and state guidance to provide content to correctly inform WIOA partners, program participants, and other stakeholders in the community.

Corrective Action: The local area shall adjust the policy and the document provided to the participant so that it includes the items noted in the finding. The policies and form must be provided to the WIOA Title I Monitoring Team for review upon modification.

LWDB Response: The LWDA has updated policy and forms which have been reviewed by the VCCS Monitoring Team. The new form has been implemented.

VCCS Evaluation: STATUS - CLOSED

The VCCS reviewed the LWDB's corrective action plan. The VCCS has determined that the LWDB has satisfied the requirements of the corrective action and considers this finding closed.