

City of Alexandria, Virginia

MEMORANDUM

DATE: MARCH 23, 2026

TO: KATE GARVEY, DIRECTOR DEPARTMENT OF COMMUNITY AND HUMAN SERVICES

FROM: ROBERT SNYDER, CHIEF INTERNAL AUDITOR 

THROUGH: DOUGLAS JONES, INTERNAL AUDITOR

SUBJECT: WIOA PROGRAM COMPLIANCE REVIEW – PROGRAM YEAR 2024

Background

The City of Alexandria, in partnership with Arlington County, administers the Workforce Innovation and Opportunity Act (WIOA) program. Through WIOA, local job centers provide employment services, including job search assistance and training programs designed to improve individuals’ workforce skills and career opportunities. The Alexandria/Arlington Workforce Council (AARWC) is responsible for overseeing these job centers and carrying out monitoring and oversight activities in accordance with WIOA requirements. Under the Workforce Innovation and Opportunity Act of 2014, all recipients and subrecipients of WIOA Title I funds must be monitored to ensure compliance with WIOA provisions, the Uniform Administrative Requirements (2 CFR Part 200), and other applicable federal laws and regulations. As the designated local WIOA Title I administrative entity, the Virginia Community College System (VCCS) conducts the required annual compliance monitoring.

Prior Engagements

Engagement	Audit Findings
<u>DCHS WIOA Program Compliance Review PY23 FS25-02</u>	2 findings and no concerns that required corrective actions all of them dealt with documentation in the case file system
<u>DCHS WIOA Program Compliance Review PY22 FS24-03</u>	4 findings each with required actions, 4 concerns each with required actions, and 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.
<u>DCHS WIOA Program Compliance Review PY21 FS23-03</u>	16 findings with 6 different case managers or clients. Of the 16 findings, all but one of them dealt with documentation in the case file system. Regarding documentation all findings involved either lack of case notes or lack of documentation of skills/training. The other finding dealt with client training activity being unallowable due to unmet prerequisites

Summary

From April to May 2025, VCCS conducted a monitoring review of our WIOA grant. On July 29, 2025, VCCS issued the annual compliance review for Program Year 2024 to Alexandria and Arlington County. The review identified four (4) findings, each with required corrective actions; four (4) concerns, each with required actions; and one (1) consideration that did not require action. The Alexandria/Arlington Regional Workforce Council (AARWC) was required to develop and implement a Corrective Action Plan (CAP) to address all findings. The following are the corrective actions taken:

- The AARWC has collected and submitted the missing Attachment B Partner Program forms to the DWDA Compliance Monitoring Team for review.
- Whistleblower Protections, Buy American, Clean Air Act, Federal Water Pollution Control Act compliance, and the Byrd Anti-Lobbying Amendment have been incorporated into the SkillSource contract through a formal amendment. Funding amounts per stream are identified and awarded through purchase orders in alignment with contract requirements. A copy of the fully executed PY25 contract, demonstrating inclusion of these federal provisions, will be provided to the monitor by September 1, 2025.
- The LWDA will provide documentation for personal mileage and meal allowances to the DWDA Compliance Monitoring Team by September 5, 2025. The certified WEX timesheets for them issuing participants have been uploaded to the participant record on VaWC, as well as with a supporting case note.
- The VaWC participant records have been updated, and missing documentation has been collected and uploaded. Please see Schedule A attached to this spreadsheet for details of the individual corrective actions taken for each case. Pending finding to be corrected by September 5, 2025.
- The local area will provide a written explanation of efforts to recruit and engage youth to the DWDA Compliance Monitoring Team by September 5, 2025.

On August 29, 2025, the Data Administrator for the WIOA Council submitted the final CAP revisions to VCCS. On November 6, 2025, the Workforce Compliance Monitor for VCCS confirmed that all corrective actions had been completed and that the CAP would be officially closed. In addition, Alexandria's Office of Internal Audit independently reviewed the CAP and confirmed that AARWC fulfilled all required actions related to the monitoring findings.

Based on our verification of AARWC's completion of the CAP and VCCS's formal approval, we conclude that this engagement has been fully resolved. If you have any questions, please contact the Office of Internal Audit at internalaudit@alexandriava.gov.

November 6, 2025

David Remick, Executive Director
Alexandria/Arlington Regional Workforce Council
2100 Washington Blvd
Arlington, VA 22204

RE: PY 2025 Corrective Action Plan (CAP) Status

Dear David,

The Department of Workforce Development and Advancement (DWDA) Compliance Monitoring Team conducted the required annual compliance review of the WIOA Title I Adult, Dislocated Worker and Youth Formula Funded programs awarded to the Alexandria/Arlington Regional Workforce Council (AARWC).

The review resulted in four finding and one concern requiring corrective action. The DWDA Compliance Monitoring Team reviewed the AARWC's corrective action plan and supporting documentation and determined that all findings and concerns have been resolved.

Sincerely,

Beverly W. Suthers
Compliance Monitor
Department of Workforce Development and Advancement

Richmond, Virginia

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Finding 1: *Local Memorandum of Understanding (MOU) and Infrastructure Funding Agreement (IFA)*

Issue: A review of the local area partner MOU and Program Year (PY) 2024 revealed that the MOU Attach B Partner Program Agency pages were missing.

Corrective Action: The AARWC is required to collect and submit the missing Attachment B Partner Program forms to the DWDA Compliance Monitoring Team for review. Updated guidance and training on the One-Stop MOU and IFA development process will be provided later this year.

DWDA Evaluation: STATUS - CLOSED

The DWDA reviewed the AARWC's corrective action plan and has determined that the AARWC has satisfied the requirements of the corrective action; therefore, this finding is considered closed.

Finding 2: *Contracts*

Issue: PY24 contracts were reviewed and found to be missing several required provisions.

Corrective Action: The AARWC must ensure that all future Requests for Proposal (RFPs) and contracts exceeding the simplified acquisition threshold incorporate the required federal provisions, including Whistleblower Protections, Buy American, Clean Air, and Federal Water Pollution Control Act compliance, the Byrd Anti-Lobbying Amendment, and provide funding amounts awarded per funding stream. A copy of the fully executed PY25 contract, demonstrating inclusion of these provisions, shall be submitted to the DWDA Compliance Monitoring Team for review.

DWDA Evaluation: STATUS - CLOSED

The DWDA reviewed the AARWC's corrective action plan and has determined that the AARWC has satisfied the requirements of the corrective action; therefore, this finding is considered closed.

Richmond, Virginia

Finding 3: *Expenditure Review*

Issue: A sample of local area expenditures was reviewed. Five Work Experience (WEX) timesheets were reviewed during the fiscal review. Four timesheets were missing the required signatures of both the supervisor and the participant. Supporting documentation for employees' personal mileage and meals allowance while attending the NAWDP Business Services Conference was missing.

Corrective Action: The LWDA must provide a copy of the documentation for personal mileage and meal allowances, and certified WEX timesheets. This documentation must be submitted to the DWDA Monitoring Team for review.

DWDA Evaluation: STATUS - CLOSED

The DWDA reviewed the AARWC's corrective action plan and has determined that the AARWC has satisfied the requirements of the corrective action; therefore, this finding is considered closed.

Finding 4: *Virginia Workforce Connection (VaWC) Records Management*

Issue: Reports on participants' activity status were run for the current program year. A sample of participants' records was reviewed, focusing on individual employment plans, supportive services, incentives, and compliance with implementing fully electronic case files.

Corrective Action: The AAWRC must review the cases identified in Attachment A and make appropriate corrections to the active participant records in the VaWC. Missing documentation must also be collected and loaded into the VaWC. *If appropriate documentation to support participant eligibility cannot be obtained, the AAWRC must notify the DWDA Compliance Monitoring Team and take necessary steps to reimburse the WIOA program for any funds spent on ineligible participants. The AAWRC must ensure that case managers receive training in the guidelines listed above to ensure an understanding of data entry and documentation requirements. Documentation of these actions, including an agenda and attendance records for the training, must be submitted to the DWDA Compliance Monitoring team for review.

DWDA Evaluation: STATUS - CLOSED

The DWDA reviewed the AARWC's corrective action plan and has determined that the AARWC has satisfied the requirements of the corrective action; therefore, this finding is considered closed.

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A. Concern A: *Low Youth Service Provision*

Issue: A VaWC report indicated that for PY24, there were only 37 participants, with 7 actively participating in WIOA youth services; the remaining 30 participants had exited the program. The LWDA has faced challenges in recruiting and enrolling youth due to competition from other youth programs in the area. The low enrollment causes concern that the programmatic and performance goals will be challenging to meet for the new program year. Currently, the LWDA has zero credential rates for youth for the first and second quarters of PY24.

Corrective Action: The local area must provide a written explanation of efforts to recruit and engage youth. The requested documentation must be submitted to the DWDA Compliance Monitoring team for review.

DWDA Evaluation: STATUS - CLOSED

The DWDA reviewed the AARWC's corrective action plan and has determined that the AARWC has satisfied the requirements of the corrective action; therefore, this finding is considered closed.

Richmond, Virginia

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