City of Alexandria, Virginia

MEMORANDUM

DATE: NOVEMBER 9, 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 2025

Background

The City of Alexandria, in partnership with Arlington County, administers the Workforce Innovation and Opportunity Act (WIOA) program, which provides employment services through local job centers, including job search assistance and workforce training to enhance participants' skills and employment opportunities. The Alexandria/Arlington Workforce Council (AARWC) is responsible for overseeing the operations of these job centers and conducting monitoring activities to ensure compliance with applicable 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, Virginia Works (VW) conducts the required annual compliance monitoring.

Prior Engagements

Engagement	Audit Findings
DCHS WIOA Program Compliance Review PY24 FS26-07	4 findings each with required actions, The AARWC was required to complete a corrective action plan (CAP) for all of the required findings.
DCHS WIOA Program Compliance Review PY23 FS25-02	2 findings and no concerns that required corrective actions all of them dealt with documentation in the case file system
DCHS WIOA Program Compliance Review PY22 FS24-03	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.
DCHS WIOA Program Compliance Review PY21 FS23-03	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 February to March 2026, VW conducted a monitoring review of our WIOA grant. On May 4, 2026, VW issued the annual compliance review for Program Year 2025 to Alexandria and Arlington County. The review identified two (2) findings, each with required corrective actions. 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 department was required to address several findings involving the Stevens Amendment. The Stevens Amendment references a federal law named after Senator Ted Stevens which requires that recipients of federal grant funding disclose the financial breakdown of a project when public communications are being made.

- The department was provided a list of deficiencies involving missing documentation, correcting inaccurate data, and removing personally identifiable information (PII). DCHS was notified that they should notify the Department of Workforce Development and Adult Learning (DWDA) Compliance Monitoring Team and take the necessary steps to reimburse the Workforce Innovation and Opportunity Act (WIOA) program for funds expended on ineligible participants if participant eligibility could not be substantiated.

- The local area must submit a written summary of youth recruitment and engagement efforts to the Department of Workforce Development and Adult Learning (DWDA) Compliance Monitoring Team by September 5, 2025.

- Supervisory and case management staff are provided training on WIOA documentation requirements, data entry timeliness, and PII handling by the DWDA Title I Programs team. A training agenda and sign-in sheet must be submitted to the Virginia Works Compliance Monitoring team for review.

Conclusion

On July 17, 2026, the Data Administrator for the WIOA Council submitted the final CAP revisions to VW. On August 12, 2026, the Workforce Compliance Monitor for VW 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 VW'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.

Virginia Department of Workforce Development and Advancement

Workforce Innovation and Opportunity Act
Title I Programs
Annual Compliance Review

Issued to:

Alexandria/Arlington Regional Workforce Council

Program Year 2025

May 4, 2026

Prepared by:
Beverly W. Suthers
Compliance Monitor

Purpose of the Review

The Workforce Innovation and Opportunity Act of 2014 (WIOA) mandates the monitoring of recipients and sub-recipients of 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. The Virginia Department of Workforce Development and Advancement (VDWDA), as the WIOA Title I Programs administrative entity, conducts the required annual compliance monitoring of Virginia's fourteen (14) local workforce development areas (LWDAs).

Dates of the Review

February 1, 2026 to March 9, 2026

Scope of the Review

Monitoring was conducted via enhanced desk review and onsite visits to:

- Ensure that Local Workforce Development Board (LWDB) activities and One-Stop System Operations are compliant with federal and state regulations and guidelines governing WIOA Title I funded activities.
- Determine that expenditures have been made against the proper cost categories and within the cost limitations specified in the federal and state regulations and guidelines.
- Ensure subrecipient compliance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards found at 2 CFR 200.
- Ensure that resources are efficiently and effectively used for authorized purposes and are protected from waste, fraud, and abuse.
- Ensure the Virginia Workforce Connection (VaWC) accurately reflects client participation and contains supporting documentation for all services provided.

This report contains the results of the administrative, fiscal, and program reviews for Program Year 2025. The report may include commendations, findings, concerns, and considerations. If the review team identified a finding or concern, a detailed description and the required or recommended actions are provided. Although no material issues came to the reviewers' attention other than those contained in this report, there is no assurance that other issues may not exist. The following describes the difference between findings, concerns, and considerations.

- *Finding:* Findings indicate that the area is out of compliance with current federal laws/regulations or state and local policies. Each finding has a required action to ensure compliance. The local area must provide a corrective action plan for all findings.

- *Concern:* Concerns identify potential risk to the local area and may result in a future finding if the issue is not addressed. Although this does not indicate that the local area is out of compliance, recommended or required corrective actions are provided to improve services to the local area.

- *Consideration:* Considerations address an area identified that may benefit the local area or enhance the monitoring of the local area.

The Alexandria/Arlington Regional Workforce Council (AARWC) must provide a corrective action plan for all required actions as indicated in this report.

Findings

1. Missing Stevens Amendment Disclosure Statement

Condition: The Stevens Statement was missing on the Gain Work Experience WIOA flyer and the 2025 Arlington Employment Center (AEC) Jobseeker flyer.

Cause: The AARWC has not updated its marketing or print templates, and staff remain unfamiliar with Stevens requirements for websites, outreach materials, posters, brochures, and press releases. In addition, shifting funding priorities and space limitations have created further challenges.

Criteria: Public Law 101-166, Sec 511 (original citation); Public Law 117-328 (Consolidated Appropriations Act, 2023) Div. H, Title V, Sec. 505

Required/Completed Corrective Action(s): The AARWC has provided evidence that:

- All master templates used are updated to include the Stevens Statement.
- Concise text that links to a page with the full details is used when space is tight.
- Pre-release check process for materials to ensure that the Stevens statement is present.
- Staff were trained on Stevens Statement requirements. Documentation must include a training agenda and sign-in sheet.

** LWDA during the draft comment period, provided documentation of completed actions*

2. Virginia Workforce Connection (VaWC) Records Management

Condition: An electronic review of participant records in the Virginia Workforce Connection (VaWC) identified systemic noncompliance with WIOA policy and case file documentation requirements. Multiple records lacked required eligibility and intake documentation, contained outdated or missing Equal Opportunity forms, and reflected untimely or inaccurate data entry.

Additional deficiencies included incomplete documentation of services and outcomes (e.g., credentials and measurable skill gains), insufficient case notes, missing or incomplete IEP/ISS, and lack of documented barriers or co-enrollment considerations. Data integrity and

confidentiality issues were also noted, including improper inclusion of PII and commingling of participant information. *(See Attachment A for detailed supporting information)*

Cause: The condition is attributed to inadequate internal controls and the absence of standardized procedures governing case file review and system corrections within the Virginia Workforce Connection (VaWC). Staff lack clear guidance and consistent expectations for conducting comprehensive record reviews following system closure corrections, resulting in incomplete validation of case notes, IEP/ISS documentation, and recorded activities.

Additionally, supervisory oversight is limited by the inconsistent use of available VaWC case management reports and the absence of a formal quality assurance process. Contributing factors include insufficient staff training on documentation standards and monitoring tools, as well as the lack of routine file reviews to ensure compliance with WIOA and state policy requirements.

Criteria: Training and Employment Guidance Letter (TEGL) 21-16 WIOA Title I Youth Formula Program Guidance; TEGL 39-11 Personally Identifiable Information; Virginia Workforce Letter TEGL 23-19, Change 3 Guidance for Validating Required Performance Data; (VWL) 24-03, Change 1 WIOA Title I Eligibility Guidance; VWL 21-02 Measurable Skill Gains Guidance; VWL 20-06 WIOA Participant Activity Code Definitions, Projected Durations, and Use Projection Limitations.

Required Corrective Action(s): The AARWC must provide evidence that:

- The cases identified in Attachment A were reviewed and remediation was conducted to correct the identified deficiencies, including uploading missing documentation, updating inaccurate data, and removing improperly stored PII. * If appropriate documentation to support participant eligibility cannot be obtained, the AARWC must notify the DWDA Compliance Monitoring Team and take the necessary steps to reimburse the WIOA program for any funds spent on ineligible participants.
- Supervisory and case management staff are provided training on WIOA documentation requirements, data entry timeliness, and PII handling by the DWDA Title I Programs team. A training agenda and sign-in sheet must be submitted to the Virginia Works Compliance Monitoring team for review.
- AARWC developed and implemented written procedures for case file management and a quarterly schedule for ongoing quality assurance monitoring/ data validation process.

Areas of Concern

No concerns.

Considerations

- ***Consent to Exchange Information Form***

The current "Consent to Exchange Information" form includes language stating the form is good for one year after employment. Organizations receiving the form will not know the date the participant entered employment. The AARWC should consider updating the form's verbiage to "expires two years from the signature date" or indicate the date the form expires.

Next Steps

Development of a Corrective Action Plan

Upon receipt of this report, the AARWC must develop a corrective action plan that addresses the findings and concerns with required actions in this report. A corrective action form is provided with this report. The AARWC must submit the completed form to the Virginia Works Compliance Monitoring Team for approval within **30 calendar days**, including documentation of any required actions completed within the 30 calendar days and a timeline for any remaining items. It is expected that work on corrective actions will be ongoing. All corrective actions are expected to be completed within **90 calendar days** from the date of the final report unless additional time is approved by the Virginia Works Compliance Monitor for specific items.

Follow-up

Once the plan is approved, the AARWC shall provide monthly updates on the status of the plan until all the actions identified are complete. Supporting documentation is required to demonstrate the completion of the actions.

The Virginia Works Compliance Monitoring Team will monitor the implementation of corrective actions and provide technical assistance, as needed or requested, to ensure completion. If corrective actions are adequate to resolve the findings, a written notification will be issued to the AARWC. If corrective actions are not resolved within the approved timeframes noted in the corrective action plan, the issues shall be referred to the Virginia Works Director of Compliance and EO for review and determination of further direction or the imposition of sanctions.

Attachment A: VaWC Records Management

Status Reports – Results		
State ID	**Notes**	**Needed Action**
System Closures		
3696775	202 - Career Guidance/Planning	Remove and/or edit system closure as appropriate; add or edit case note
3699815	300 - Occupational Skills Training - Approved Provider	
3726274	202 - Career Guidance/Planning	
3730873	153 - Job Search/Placement Assistance, including Career Coaching	
3732317	422 - Youth Financial Literacy Education	
1560683	300 - Occupational Skills Training - Approved Provider	
File Review – Results		
State ID	**Issue**	**Action Needed**
1175485 Adult Exited	Upon review of the participant's VaWC records, it was noted that the signed WIOA Application was missing from the VaWC uploads. The recently enrolled participant signed an older EO form listing VCCS instead of Virginia Works. The participant's IEP did not address the need for supportive services. Documentation for supportive services was either missing or uploaded past the timely data entry requirements. Records were unclear about how the participant pursued and had not been provided with supportive services through other sources. A completion of CDL training was uploaded as a credential instead of an MSG. The credential is the attainment of the CDL license, which was not uploaded into the VaWC.	The case manager must upload the signed application into the VaWC. LWDA must ensure staff do not use outdated forms with inaccurate information and provide training in the importance of using the correct forms. LWDA must provide training on completing IEPs, the documentation required, and timely data entry into the VaWC.
1632628 Adult Active	Upon review of the participant's record, it was discovered that PII information was listed in the VaWC objective assessment and in the case note dated 10/31/25. The participant disclosed a disability on their objective assessment, which was not captured in the VaWC Application. The uploaded priority of service form was signed but was not filled out.	LWDA must remove PII information from the objective assessment and case note. LWDA must provide training on capturing all information on the WIOA Application, documentation requirements, and timely data entry into the VaWC.

3690563 Adult Active	Upon review of the participant's VaWC record, it was noted that the participant signed an older EO form listing VCCS instead of Virginia Works. An OST was opened with a projected begin date of 9/15/25 and closed 9/2/25 with an unknown status. Case note dated 9/2/25 indicates the activity was opened in error and was to be deleted.	LWDA must ensure staff do not use outdated forms with inaccurate information and provide training in the importance of using the correct forms. LWDA must void this OST activity code.
2682598 Adult Exited	Upon review of the participant's VaWC records, it was noted that the WIOA Application did not capture the participant's SNAP status. The OST activity code was closed on 10/9/25; however, the certificate of completion shows the last day of training was 10/2/25. IEP remained open after closure. Follow-up has not been provided.	LWDA must provide training in the importance of capturing barriers in the VaWC, using correct dates for activities, and closing IEPs. LWDA must update client case notes, enter the credential if one has been attained, close the open IEP, and conduct follow-up services if no further services are required.
3656034 Adult Active	Last contact case note was on 10/22/2025, with concerns regarding training and passing the completion exam. As of 2/20/26, there has been no further contact with the participant. OST was closed 11/21/25 as a Successful Completion. A measurable skills gain has not been entered into the VaWC. No documents have been uploaded since 10/3/25.	LWDA must provide training in entering case notes and documenting all case management actions. Update missing case notes to document case management with the participant.
3727739 Adult/Youth Active	The WIOA Application captures a youth disability with no case note or documentation of a disability. Documents were uploaded to support the participant's basic skills deficiency (BSD) in both reading and math. The VaWC application states the participant is not BSD. Required documentation of the Selective Service was missing. Upon review of the participant's VaWC record, it was noted that the VaWC IEP/ISS was for another participant, referencing another Training Provider. Case notes reference a "she" and medical training. Later in the case notes, the participant was referred to as a "he" and referenced the Seaport Foundation for applied learning in woodworking and traditional shipbuilding. The participant is a "he" interested in woodworking and shipbuilding.	Documentation of barriers and selective service is a **requirement of eligibility**. If proof of barrier and selective service is not uploaded, there is a risk of incurring disallowed costs incurred for the participant. LWDA must update case notes and IEP/ISS for the proper participant, upload missing documentation, and provide training in the importance of the accuracy of case notes, capturing all data in the WIOA Application, expectations of

	The required signed WIOA Application and a signed IEP/ISS were missing from the VaWC uploads. The Grievance/Complaint & EEO/Discrimination, Consent to Exchange Information was uploaded past the time limitations. Case notes did not explain the need for co-enrollment in both the Adult & Youth program and what funding will be utilized for which services. The Work Experience (WEX) Agreement is for Seaport Foundation with a mention of apprentices on the bottom of page 7. There was a VaWC activity code for work experience. The Certificate of Completion was for an Apprentice Program. Records are unclear whether this was a work experience or a pre-apprenticeship. If this were a WEX, the educational component was not uploaded into the VaWC. Wage, workdays, and work hours were missing from the Work Experience documentation. End date of the work experience should have been 12/19/25, not 1/26/26. The participant's first timesheet, he was only paid for 10.17 hours instead of the 22.38 hours he worked. The participant's second timesheet, he was paid 57.36 hours instead of the 56.36 hours he worked. The participant was shorted by a total of $224.40. Measurable Skills Gain (MSG) was entered as 1/19/26 when it should be 12/19/26.	uploading all required documents for completing a WEX agreement, and the importance of using correct dates for data validation. The LWDA must update the case note with an explanation for co-enrollment. The LWDA must provide clarification of the activity and ensure that the appropriate documentation is uploaded into the file. The LWDA must correct the end date of the WEX. The LWDA must pay the participant the funds owed and explain the shortage of pay. The LWDA must correct the MSG date.
3171110 DLW Active	Upon review of the participant's VaWC record, it was noted that an IEP had not been completed. The required Consent to Exchange Information, EO/Discrimination, and Grievance/Complaint were missing from the VaWC uploads. Two- to three-month gaps were found between case notes.	The LWDA must complete the VaWC IEP, upload all missing documentation, and provide training on the timely entry of case notes and uploading of required documents.

	Customer choice of training was missing from the VaWC uploads.	
3711843 DLW Exited	Upon review of the participant's VaWC record, it was noted that the IEP was not updated for the need of supportive services. An ITA with documents to support the cost of training and documentation on how the participant pursued and had not been provided support services through other sources was missing from the record.	The LWDA must upload missing documentation and provide training on writing IEP/ISS and uploading required documentation.
3737849 DLW Active	Upon review of the participant's VaWC record, it was noted that the Dislocated Worker-funded VaWC activity for Develop Service Strategies was opened 10/20/25 and extended until 06/30/26, which is past the timely limitations. A signed WIOA Application was missing from the VaWC uploads.	The LWDA must update the VaWC record to the correct time period of the VaWC IEP activity code, upload missing documents, and provide training on required uploads and time limitations for VaWC records.
3320571 Youth Active	**ELIGIBILITY**: Upon review of the participant's VaWC record, it was noted that documentation to support the basic skills deficiency barrier was missing from the VaWC uploads. A blank WIOA Youth Work Experience Program Bi-Weekly Timesheet and WIOA Youth Work Experience Program Participant Work Experience Evaluation Form were signed & dated by the participant. The WEX timesheet for the period of 9/29-10/5/25 and the Department of Community and Human Services Invoice were missing from the VaWC uploads. No time sheets for the WEX were uploaded after 11/26/25. The WEX was closed on 1/13/26 as a successful completion. WEX monthly evaluations were not uploaded into the VaWC. All VaWC activities were entered as funded by the Youth program except for Job Search, which is funded by the Adult program. Case notes did not explain the need for co-enrollment in both the Adult & Youth program and what funding will be utilized for which services.	Documentation of barriers is a **requirement of eligibility**. If proof of barrier is not uploaded, there is a risk of disallowed costs incurred for the participant. The LWDA must upload missing documentation and provide training on the use of correct dates, not signing documents ahead of time, and uploading required documents into the VaWC. The LWDA must update the case note with an explanation for co-enrollment or update the job search activity to a VaWC youth activity.

3700829 Youth Closed	**ELIGIBILITY**: Upon review of the participant's VaWC record, it was noted that Eligibility documentation of BSD, low income, and school status was missing from the record. The required signed Grievance/Complaint and EEO/Discrimination Form was missing from the VaWC uploads. The participation date was 03/19/25. No case notes were entered for the participant until 5/21/25. Case notes did not indicate that services were provided to the participant. Due to a lack of case notes and uploaded documentation, VaWC activities and dates are unclear. The ISS Activity code was initiated on 3/27/25 and was uploaded on 10/15/25, past the timely data entry guidelines. An ITA was issued to Kitchen with a Purpose 4/4/25. This program is schooling with a WEX component built in. A WEX agreement was included with a begin date of 3/21/25 and an end date of 5/23/25. • VaWC WEX Activity was not entered into the VaWC. • Documentation of begin and end dates, the wage to be paid, timesheets, and monthly evaluations were missing from the file. • The invoice supporting the costs of the training and WEX was missing from the VaWC. Two credentials were entered into the VaWC dated 11/19/25. One credential was earned on 4/11/25 for Allertrain, not two. The first case note, dated 4/8/25, states the participant will need supportive services for transportation and that a request will be entered for the participant to receive those services. There is no VaWC activity for transportation, and no supportive services documents have been uploaded. It is unclear if the participant has ever received this service. ISS remains open, although an exit was entered for the participant.	Documentation of school status and barriers is a **requirement of eligibility**. If the proof of school status and barriers is not uploaded, there is a risk of disallowed costs incurred for the participant. LWDA must upload missing documentation, update case notes, and VaWC activity dates to reflect services provided to the participant. The LWDA must provide case management training on the use of correct dates, proper case notes, timeliness of data entry, closing ISSs, credentials/MSG, and uploading required documents into the VaWC.

	The last case note entered was 11/21/25.	
3715090 Youth Closed	**ELIGIBILITY**: Upon review of the participant's VaWC record, it was noted that Eligibility documentation of low income, school status, and the required signed WIOA Application were missing from the VaWC uploads. The Equal Opportunity Rights and Grievance Resolution Policy contains the address for the Virginia Community College System. Neither an objective assessment nor ISS was completed in the VaWC for the participant, nor was either uploaded into the VaWC. VaWC activity for Comprehensive Guidance and Counseling was opened 9/12/25 with a closing date of 3/15/26, extended past the time limitations. The activity may only be extended every 30 days. The participant was co-enrolled with the adult program. Case notes did not indicate the need for co-enrollment.	The LWDA must upload documentation of eligibility and intake documents. If the proof of school status, low-income barriers is not uploaded, there is a risk of disallowed costs being incurred for the participant. The LWDA must provide case management training on the use of correct dates, proper case notes, timeliness of data entry, closing ISSs, and uploading required documents into the VaWC.