

ARIZONA@WORK Job Center One Stop Center Operator Selection Policy

**04-2016** **ARIZONA@WORK Job Center One Stop Center Operator Selection**

**ISSUING AGENCY:** State Workforce Development Board

**SCOPE:** State Workforce Development Board, Arizona Department of Economic Security, Arizona Department of Education, Arizona Commerce Authority/Office of Economic Opportunity, Local Workforce Development Boards, Local Workforce Administrative Entities and Fiscal Agents, One-Stop Center Operators, and Workforce System Stakeholders

**REFERENCES:** Title I of the Workforce Innovation and Opportunity Act (WIOA) of 2014, (Pub. L. 113-128); WIOA Final Regulations, 20 CFR Part 678 Description of the One-Stop System Under Title I of the WIOA; 20 CFR Part 679, 680, and 681; 2 CFR 200, Uniform Guidance for Federal Financial Assistance, as applicable.

**EFFECTIVE DATE:** **February 16, 2017**

**OBJECTIVE:** This policy provides local workforce development boards and other workforce system partners with instruction and guidance regarding the roles and responsibilities of the One Stop Operator and the competitive selection process required under WIOA. Note: The term one-stop delivery system is used interchangeably with ARIZONA@WORK Job Center service delivery system.

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**I. DEFINITIONS:** The **One-Stop Delivery System** brings together workforce development, educational, and other human resource services in a seamless customer-focused service delivery network that

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enhances access to the programs' services and improves long-term employment outcomes for individuals receiving assistance. One-stop partners administer separately funded programs as a set of integrated streamlined services to job seeker and employer customers. (20 CFR 678.300)

In Arizona, American Job Centers, also referred to as the one-stop delivery system, are known as **ARIZONA@WORK Job Centers**.

In Arizona, **the State Workforce Development Board** is called the **Workforce Arizona Council (WAC)**.

In Arizona, the **State Administrative Entity** is the Arizona Department of Economic Security for WIOA Title I, III, and IV funds and the Arizona Department of Education for WIOA Title II funds.

## **II. Roles Within the One Stop Delivery System**

WIOA provides for five roles in the One Stop Delivery System: Fiscal Agent, Local Workforce Development Board (LWDB) staff, One Stop Center Operator, direct services provider (career and/or youth services), and training services provider. The One Stop Center Operator and direct services provider roles may be combined based on the direction of the LWDB; however, adherence to firewalls apply. (20 CFR 679.420, 20 CFR 679.400, 20 CFR 678.600, 20 CFR 680.160, 20 CFR 681.400, 20 CFR 680.300)

Currently, this policy does not include the local area designated as Nineteen Tribal Nations (NTN) because of their complicated structure, which is unique to Arizona.

## **III. Roles and Responsibilities of the Local Fiscal Agent**

A. In order to assist in administration of the grant funds, the chief elected official may designate an entity to serve as a local fiscal agent. Designation of a fiscal agent does not relieve the chief elected official of liability for the misuse of grant funds. (20 CFR 679.420)

B. If the CEO designates a fiscal agent, the CEO must ensure this agent has clearly defined roles and responsibilities. In general, the fiscal agent is responsible for the following functions: (20 CFR 679.420)

1. Receive funds
2. Ensure sustained fiscal integrity and accountability for expenditures of funds in accordance with Office of Management and Budget circulars, WIOA and the corresponding Federal Regulations and State policies

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3. Respond to audit financial findings
  4. Maintain proper accounting records and adequate documentation
  5. Prepare financial reports
  6. Provide technical assistance to sub-recipients regarding fiscal issues
- C. At the direction of the Local WDB, the fiscal agent may have the following additional functions (20 CFR 679.420):
1. Procure contracts or obtain written agreements.
  2. Conduct financial monitoring of service providers.
  3. Ensure independent audit of all employment and training programs.

**IV. Roles and Responsibilities of LWDB Staff**

WIOA sec. 107(f) grants Local WDBs authority to hire a director and other staff to assist in carrying out the functions of the Local WDB. (20 CFR 679.400)

- A. Local WDBs must establish and apply a set of qualifications for the position of director that ensures the individual selected has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in carrying out the functions of the Local WDB. (20 CFR 679.400)
- B. The Local WDB director and staff must be subject to the limitations on the payment of salary and bonuses described in WIOA sec. 194(15). *WIOA sec 194 (15)(A) states "None of the funds available under this title shall be used by a recipient or subrecipient of such funds to pay the salary and bonuses of an individual, either as direct costs or indirect costs, at a rate in excess of the annual rate of basic pay prescribed for level II of the Executive Schedule under section 5313 of title 5, United States Code."* (20 CFR 679.400)
- C. In general, Local WDB staff only may assist the Local WDB fulfill the required functions at WIOA sec. 107(d). (20 CFR 679.400)
- D. The LWDB staff roles and responsibilities include, but are not limited to:
1. Convene system stakeholders to assist in the development of the local plan;
  2. Prepare and submit local plans (as required under sec. 107 of WIOA);
  3. Negotiate local performance accountability measures;
  4. Assist the LWDB in developing and submitting a budget for activities of the Local Board in the local area.

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5. Monitoring and evaluating the management and operations of all programs funded by the LWDB;
6. Conduct the competitive selection process for one stop center operators and direct services providers;
7. Monitoring operators/service providers at comprehensive or affiliate sites for performance, quality of service, cost effectiveness, and reporting on performance to the Board;
8. Any other functions specifically assigned to the LWDB in WIOA section 107(d).

(Note: Items 1-7 are taken from 20 CFR 678.620 b1)

**V. Who May Be One Stop Center Operators:**

- A. One-stop center operators may be a single entity (public, private, or nonprofit) or a consortium of entities. If the consortium of entities is one of the one-stop partners, it must include a minimum of three of the required one-stop partners. In a consortium, all contractual responsibility must rest solely with one legal entity serving as the fiscal agent. A consortium must also be selected through a competitive procurement process.
  1. The one-stop operator may operate one or more one-stop centers. There may be more than one one-stop operator in a local area.
  2. One-stop operators may include the following entities:
    - i. An institution of higher education;
    - ii. An Employment Service State agency established under the Wagner-Peyser Act;
    - iii. A community-based organization, nonprofit organization, or workforce intermediary;
    - iv. A private for-profit entity;
    - v. A government agency;
    - vi. A Local Board, with approval of the chief elected official and the Governor; or
    - vii. Another interested organization or entity, which is capable of carrying out the duties of the one-stop operator. Examples may include a local chamber of commerce or other business organization, or a labor organization.
  3. Elementary schools and secondary schools are not eligible as one-stop operators, except that a nontraditional public secondary school such as a night school, adult school, or an area career and technical education school may be selected.

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- B. To eliminate any potential conflicts of interest or the appearance of conflicts of interest, and conduct fair and open competitive processes, the LWDB must develop a written plan of how it will operate with firewalls that are compliant with WIOA and Uniform Guidance at 2 CFR Part 200, subpart D. Examples of compliance may include, but are not limited to: 1) the LWDB and its staff exist in an organization separate and distinct from the organization that acts as the One Stop Center Operator and/or service provider; or 2) staff to the LWDB operates in one department of the organization and the One Stop Center Operator and/or service provider operates in another separate and distinct department within the same organization. Departments must demonstrate different reporting structures.

Per WIOA, there must be appropriate firewalls between staff providing services and staff responsible for oversight and monitoring of services. The same person or department cannot both provide services and oversee the provision of those services. (Joint WIOA Final Rule, page 55898; Federal Register, Vol 81, no. 161, August 19, 2016)

- C. LWDB staff only may assist the LWDB to fulfill its functions (20 CFR 679.400 (d)).

**VI. One-Stop Center Operators Roles and Responsibilities:**

- A. The LWDB must determine the roles and responsibilities of the One Stop Center Operator(s) prior to conducting the procurement process. The competition for a one-stop operator must clearly articulate the role of the one-stop operator (20 CFR 678.620 a).
- B. At a minimum, the one-stop operator must coordinate the service delivery of required one-stop partners and service providers (20 CFR 678.620 a)
- C. Local WDBs may establish additional roles of one-stop operator, including, but not limited to (20 CFR 678.620 a):
1. Coordinating service providers across the one-stop delivery system;
  2. Being the primary provider of services within the center;
  3. Providing some of the services within the center;
  4. Coordinating service delivery in a multi-center area, which may include affiliated sites.
- D. A one-stop operator may not perform the following functions (20 CFR 678.620 b1):
1. Serve as staff to the LWDB (20 CFR 679.400 (d));
  2. Convene system stakeholders to assist in the development of the local plan;
  3. Prepare and submit local plans (as required under sec. 107 of WIOA);
  4. Be responsible for oversight of itself;

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5. Manage or significantly participate in the competitive selection process for one-stop operators;
  6. Select or terminate one-stop operators, career services, and youth providers;
  7. Negotiate local performance accountability measures; and
  8. Develop and submit a budget for activities of the Local Board in the local area.
  9. Any other functions specifically assigned to the LWDB by WIOA 107(d).
- E. The State and Local Workforce Development Boards must ensure that, in carrying out WIOA programs and activities, one-stop center operators:
1. Disclose any potential conflicts of interest arising from the relationships of the operators with particular training service providers or other service providers;
  2. Do not establish practices that create disincentives to providing services to individuals with barriers to employment who may require longer term career and training services; and
  3. Comply with Federal regulations and procurement policies relating to the calculation and use of profits, including those at 20 CFR 683.295, the Uniform Guidance at 2 CFR chapter II, and other applicable regulations and policies.

**VII. Roles and Responsibilities of Career/Youth Services Providers**

Career Services

- A. The applicable career services to be delivered by required one-stop partners are those services listed in § 678.430 that are authorized to be provided under each partner's program (20 CFR 678.425). Career services must be provided through the one-stop delivery system. Career services may be provided directly by the one-stop center operator or through contracts with service providers that are approved by the Local WDB. (20 CFR 680.160).
1. Career services provided directly by the One Stop Center Operator must be competitively procured through the One Stop Center Operator procurement process.
  2. The LWDB must determine the process for selecting and awarding contracts to service providers for services not provided by the One Stop Center Operator. The process for awarding these contracts must be in compliance with Arizona Conflict of Interest regulations (ARS 38-501 through 38-511). If LWDB decides to competitively procure these services, the process must be conducted in accordance with the Uniform Guidance at 2 CFR parts 200 and 2900, and all applicable State and local procurement laws.
- B. Working with the State, the Local WDB satisfies the consumer choice requirement for career services by (20 CFR 679.380 b):

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1. Determining the career services that are best performed by the one-stop operator consistent with 20 CFR §§ 678.620 and 678.625 and career services that require contracting with a career service provider;
2. Identifying a wide-array of potential career service providers and awarding contracts where appropriate including to providers to ensure:
  - i. Sufficient access to services for individuals with disabilities, including opportunities that lead to integrated, competitive employment for individuals with disabilities;
  - ii. Sufficient access for adult education and literacy activities.

Youth Services

- A. The grant recipient/fiscal agent has the option to provide directly some or all of the youth workforce investment activities. (20 CFR 681.400 a)
- B. However, as provided in WIOA sec. 123, if a Local WDB chooses to award grants or contracts to youth service providers to carry out some or all of the youth workforce investment activities, the Local WDB must award such grants or contracts on a competitive basis, subject to the exception explained below at paragraph (b)(4) of this section: (20 CFR 681.400 b)
  1. The Local WDB must identify youth service providers based on criteria established in the State Plan (including such quality criteria established by the Governor for a training program that leads to a recognized postsecondary credential) and take into consideration the ability of the provider to meet performance accountability measures based on the primary indicators of performance for youth programs.
  2. The Local WDB must procure the youth service providers in accordance with the Uniform Guidance at 2 CFR parts 200 and 2900, in addition to applicable State and local procurement laws.
  3. If the Local WDB establishes a standing youth committee under § 681.100 it may assign the committee the function of selecting of grants or contracts.
  4. Where the Local WDB determines that there are an insufficient number of eligible youth providers in the local area, such as a rural area, the Local WDB may award grants or contracts on a sole source basis in accordance with the Uniform Guidance at 2 CFR parts 200 and 2900, in addition to applicable State and local procurement laws.

**VIII. One-Stop Operator Selection:** The Local Board must select the one-stop operator through a fair and open competitive process at least once every 4 years (WIOA sec. 121(d)(2)(A), 20 CFR 678.605). The State may require, or a Local Board may choose to

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implement, a competitive selection process more than once every four years. (20 CFR 678.605a)

**IX. Competitive Procurement Process**

A. LWDBs must use a competitive process based on the principles of competitive procurement in the Uniform Administrative Guidance set out at 2 CFR 200.318 through 200.326, State and local procurement law, and the Arizona Conflict of Interest law (ARS 38-501 thru ARS 38-511). No later than July 1, 2017, one-stop operators selected under the competitive process described in 20 CFR 678.605 (section VIII above) must be in place and operating the one-stop center. (20 CFR 678.635 a)

The competitive procurement must include the following:

1. Requests for proposals must be publicly advertised in a paper of general circulation, through qualified vendor/interested parties lists, and must be available electronically through the LWDB website and the WAC website. The request for proposals must include a reasonable period of time for potential vendors to respond. Any response to publicized requests for proposals must be considered to the maximum extent practical (2 CFR 200.320 d1);
2. The request for proposals must identify all evaluation factors and their relative importance (2 CFR 200.320 d1);
3. The request for proposals must not include restrictive or unreasonable terms that would limit competition. (2 CFR 200.319 c1) For example, specifying that there are no funds attached to the requested procurement would be an unreasonable term. (*Joint WIOA Final Rule, page 55901; Federal Register, Vol 81, no. 161, August 19, 2016*)
4. Proposals must be solicited from an adequate number of qualified sources (2 CFR 200.320 d2);
5. The LWDB must have a written method for conducting technical evaluations of the proposals received and for selecting recipients (2 CFR 200.320 d3);
6. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered (2 CFR 200.320 d4);

B. The Local Board must document their procurement procedures in writing to reflect the standards outlined in the Uniform Guidance (2 CFR 200.318 thru 200.326). The procedures must ensure that all solicitations:

1. Incorporate a clear and accurate description of the technical requirements for the services to be procured. Such description must not, in competitive procurements,

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- contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. (2 CFR 200.319 c1)
2. Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals. (2 CFR 200.319 c2)
  3. The LWDB must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. The LWDB must not preclude potential bidders from qualifying during the solicitation period. (2 CFR 200.319 d)
- C. The Local Board also must maintain written standards of conduct regarding individual and organizational conflict of interest (“firewalls”) (2 CFR 200.318).
- D. Supporting documentation must be retained to sufficiently record the procurement process and be made available for monitoring. The LWDB must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. (2 CFR 200.318 i)
- E. The LWDB must ensure that the procurement process is conducted in a manner that ensures full and open competition. To ensure objective contractor performance and eliminate unfair competitive advantage, any organization that develops or drafts specifications, requirements, statements of work, or invitations for bids or requests for proposals, or manages or conducts the competition for a one stop operator or service provider must be excluded from competing for such procurements (2 CFR 200.319 a).
- F. The LWDB must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts. (2 CFR 200.318 b)
- G. A Local Board may enter into a contract with the successful bidder selected through the competitive procurement process. In addition to the Local Board's specific operating expectations of the One-Stop Center Operator, the contract must include the applicable Federal contract provisions contained in Appendix II to Part 200 Contract Provisions for Non-Federal Entity Contracts Under Federal Awards (2 CFR 200.326).

**X. Sole Source Procurement Process**

A sole source procurement is a contract entered into without a competitive process, based on a justification that only one known source exists or that only one single supplier can fulfill the requirements. Procurement by sole source will be permitted only if:

- A. Documented research and analysis of market conditions and other factors lead to a determination that:
  1. There is only one entity that could serve as a one stop center operator as defined by the LWDB; or
  2. Unusual and compelling urgency will not permit a delay resulting from competitive solicitation; or
  3. Results of the competition conducted by sealed bids or competitive proposals were determined to be inadequate.
- B. To gain approval for a sole source procurement, the LWDB must complete the following process:
  1. Submit to the WAC written justification for requesting approval of a sole source procurement which includes information such as:
    - i. a description of the unique features that prohibit competition;
    - ii. documented research conducted to verify the vendor as the only known source;
    - iii. a description of the marketplace to include distributors, dealers, resellers, etc.;
    - iv. prepare and maintain written documentation describing the entire process used in making such a selection.
  2. Publicly advertise in a paper of general circulation, through the LWDB website, and through the WAC website, a public notice of the intent to sole source the one stop operator procurement to allow potential vendors to indicate interest in bidding on the sole source procurement. The notice of intent to procure through sole source must include a contact source for potential vendors to indicate their interest in bidding and must include a reasonable period of time for potential vendors to respond. Submit a copy of the published notice with the request for a sole source procurement.
  3. Submit the written agreement between the Local Board and chief local elected official to clarify how the organization will carry out its responsibilities while demonstrating compliance with the WIOA and corresponding regulations, relevant Office of Management and Budget circulars, and the State's conflict of interest policy (20 CFR 679.430). Sole source procurement must include appropriate conflict of interest policies and procedures, which conform to the specifications in

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20 CFR 679.430 for demonstrating internal controls and preventing conflict of interest.

4. Within 30 days of receiving a complete request for approval of the results of a sole source procurement, the WAC or its Executive Committee will review the request and recommend approval to the Governor, disapprove, or request more information. If approved, a sole source procurement contract would be for a term of one year after which a determination is made as to whether a sole source contract is warranted or if competition is available to conduct a competitive selection process.
5. Nothing in this policy prevents the Governor from exercising his/her authority according to WIOA requirements.

**XI. Approval of LWDBs for Role of One Stop Operator and/or Service Provider**

Under WIOA, a LWDB may only serve as the One Stop Operator and/or career services provider with the approval of the Chief Elected Official in the local area and the Governor. Specifically, without approval from the Governor, LWDBs cannot serve as service providers or One Stop Center Operators. The LWDB is prohibited from serving as a training provider without obtaining a waiver from the Governor. (20 CFR 679.410)

**Process Required for LWDB To Serve as Operator/Provider**

A LWDB must complete the following process if it wishes to serve in the role of One Stop Center Operator and/or service provider:

For LWDB's serving as the service provider only (i.e. services are not defined and procured as part of the One Stop Operator role), the entity that includes both the staffing to the LWDB and the staffing to provide services does not have to complete items A, and D.1-D.4.

- A. Conduct research and market analysis to identify possible vendors and document the results in writing.
  1. If the market research and analysis identifies potential vendors, the operator/service provider procurement must occur through the competitive procurement process outlined in section IX. Consistent with Uniform Guidance, the LWDB must use a neutral third party organization to conduct the procurement process with no involvement from the LWDB or its staff. If the LWDB exists in the same organization, but in a separate department from the One Stop Center Operator/service provider, the LWDB and its staff may be involved in the

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procurement process only if there is no involvement from the department providing services in the procurement process.

2. If the research and market analysis concludes that the LWDB is the only potential source for this service, complete the written justification for requesting approval of a sole source procurement as specified in section X b.1.
3. Publicly advertise in a paper of general circulation, through the LWDB website, and through the WAC website, a public notice of the intent to sole source the one stop operator procurement to allow potential vendors to indicate interest in bidding on the sole source procurement. The notice of intent to procure through sole source must include a contact source for potential vendors to indicate their interest in bidding and must include a reasonable period of time for potential vendors to respond.

If the notice of intent to procure through sole source results in potential vendors interested in bidding on the procurement, the operator/service provider procurement must occur through the competitive procurement process outlined in section IX. Consistent with Uniform Guidance, the LWDB must use a neutral third party organization to conduct the procurement process with no involvement from the LWDB or its staff.

4. If the notice of intent to sole source results in the LWDB as the only potential source for this service, the LWDB may request selection as the One Stop Center Operator as a sole source.
- B. Create a written agreement between the LWDB and the CEO that identifies how the LWDB will ensure fair and clear performance monitoring and clear separation of LWDB staff and operations staff. The LWDB must establish sufficient conflict of interest policies and procedures (“firewalls”) and these must be approved by the Governor (20 CFR 678.610 d).
1. Conflict of interest policies and procedures must include procedures to ensure fair and clear performance monitoring and clear separation of LWDB staff and operations staff must be documented and implemented. Per WIOA, there must be appropriate firewalls between staff providing services and staff responsible for oversight and monitoring of services. The same person or department cannot both provide services and oversee the provision of those services. (Joint WIOA Final Rule, page 55898; Federal Register, Vol 81, no. 161, August 19, 2016)
  2. Monitoring responsibilities include, but are not limited to:
    - i. Gathering performance data and providing regular updates to the Local Board and the Workforce Arizona Council;

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- ii. Evaluating and reporting compliance to the provisions of WIOA and state policies; and
    - iii. Ensuring the local staff receive, understand and use LMI data to guide service delivery and decision-making.
  - C. Provide evidence that the chief elected official in the local area agrees to the selection of the LWDB as the One Stop Operator/service provider.
  - D. The LWDB must submit the following to the WAC for review:
    - Sole Source Procurement (Submit 1, 2, 5, and 6):
      1. Written research and market analysis that led to determination of sole source.
      2. Copy of published notice of intent to sole source and any responses.
    - Competitive Procurement (Submit 3, 4, 5, and 6):
      3. Copy of the request for proposals as specified in section VII a and b.
      4. Copy of the published public notice.
    - All requests must include items 5 and 6:
      5. Copy of written agreement between LWDB and CEO ensuring clear separation of staff and performance monitoring.
      6. Letter documenting that the CEO agrees to the choice of the LWDB as the One Stop Operator.
  - E. Within 30 days of a complete request, if the WAC or its Executive Committee determines that the firewalls and monitoring plan are sufficient, the request for the LWDB to serve as the One Stop Center Operator will be forwarded to the Governor with the WAC's recommendation for approval. If the WAC determines that the firewalls and monitoring plan are not sufficient, the request will be returned to the LWDB for revision.
  - F. Where a LWDB acts as a one-stop operator, the WAC must ensure certification of one-stop centers in accordance with 20 § 678.800. (20 CFR 679.410 a 3)

**XII. Accountability**

The WAC will review all procurement and firewall documentation to ensure compliance with federal law and state policy. This will include any justifications for sole source procurement, staff structures, and conflict of interest policies for operators, service providers and board staff.

If the WAC determines that a procurement process has been carried out in good faith and that appropriate firewalls exist within the local area, the WAC will refer the request for

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approval of the procurement to the Governor. If it is determined that there are deficiencies in the processes used or firewalls established, the WAC will return the request to the LWDB. A detailed explanation of the recommendation will be provided in writing to the proposing LWDB. The LWDB may make improvements and resubmit the request to the WAC.

**CONTACT ENTITY:** Inquiries regarding this policy should be directed to the Workforce Arizona Council Manager at [Ashley.Wilhelm@oeo.az.gov](mailto:Ashley.Wilhelm@oeo.az.gov) or 602-771-0482.