Mission...
Western Wisconsin WDB is a collaborative, interactive and coordinated network of training resources and support services that is providing and retaining a well-skilled labor force for employers in western Wisconsin.

Vision...
To provide a comprehensive and integrated and customer-driven and results-oriented system for workforce development that responds to the needs of the employers, job seekers, incumbent workers and youth.

WDB Operations Committee

Thursday, August 17, 2017
11:00 a.m. to 12:30 p.m.

Western Wisconsin Workforce Development Center
2615 East Avenue South
La Crosse, WI 54601

Call in: (712) 775-7031
Meeting ID: 651-305-857

RSVP your attendance to Jessie
fossj@westernwdb.org

Upcoming Meetings

Thursday, November 16, 2017
Thursday, February 15, 2018
Thursday, May 17, 2018

Committee Members

☐ Patti Balacek, Chair
Western Technical College

☐ Marina Abbott
Manpower

☐ Judy Berg
Berg Enterprises

☐ Rebecca Grapes
Badger Corrugating

☐ Mary Kessens
Riverfront

☐ Michelle Nowlan
MarketSharp

☐ Kathleen Olson
DWD

☐ Ellen Parker
AFL-CIO

☐ Roxanne Powell
DVR

☐ Vicki Proudlock
DWD Unemployment

☐ Jessica Subach
Courtesy Corporation
# Operations Committee Agenda

**Meeting Agenda**  
**Thursday, August 17, 2017**  
**11 a.m. to 12:30 p.m.**  
**Workforce Development Center Conference Room**

<table>
<thead>
<tr>
<th>Agenda Item</th>
<th>Page(s)</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. CONSENT ITEMS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Call to Order</td>
<td>Pages 3 - 5</td>
<td>x</td>
</tr>
<tr>
<td>B. Announcements and Introductions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>II. ORDER OF BUSINESS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Meeting Minutes — May 25, 2017</td>
<td>Pages 3 - 5</td>
<td>x</td>
</tr>
<tr>
<td>B. Program and Contract Performance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. WIOA</td>
<td>Pages 6 - 7</td>
<td>x</td>
</tr>
<tr>
<td>b. DOC Windows to Work</td>
<td>Page 8</td>
<td>x</td>
</tr>
<tr>
<td>c. PY 17 Performance Targets</td>
<td>Handout</td>
<td></td>
</tr>
<tr>
<td>d. PY 15 Monitoring Report</td>
<td>Pages 9 - 27</td>
<td>x</td>
</tr>
<tr>
<td>C. New Operations Policies</td>
<td>Handout</td>
<td>x</td>
</tr>
<tr>
<td>III. CONCLUSION</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Old Business</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. New Business</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IV. ADJOURN</td>
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<td></td>
</tr>
</tbody>
</table>
I. CONSENT ITEMS

A. Call to Order

The meeting was called to order at 11:00 a.m. by Ms. Balacek. A quorum was present as indicated by roll call.

B. Announcements and Introductions

Roundtable introductions were made. Ms. Balacek then explained the purpose and restructuring of the committee.

Ms. Proudlock announced that as of earlier this week all initial unemployment claims must now be made online.

Ms. Norsten said a UI staff member has been in the Job Center assisting those asking for UI claim assistance.

II. ORDER OF BUSINESS

A. Program and Contract Performance

1. WIOA

Ms. Mitchell reported the Dislocated Worker program has more individuals enrolled than anticipated due to more dislocations occurring than were projected. She stated the only area of concern with the Adult and Dislocated Worker contract is surrounding work-based learning where the service provider is behind on projected enrollments.

Ms. Norsten reported Workforce Connections has set up the first transitional job and systems are in place for transitional jobs enrollments to go more smoothly in the upcoming program year.

Ms. Mitchell reported the WIOA Youth program is on track for most areas. She said the only area of concern is the low number of out-of-school youth served. Ms. Mitchell believes this should be cleared up by the end of the program year because the busiest time of year for the youth program is coming up.

Mr. Gaworski reported WisCorps finished its spring crews and is in the middle of a heavy media push for recruiting potential members of the summer crews.

Reports were given that Workforce Connections and WisCorps have changed some of its staffing and both changes seem to be going well. Ms. Sullivan reported WisCorps has hired an outreach coordinator and Ms. Norsten reported Workforce Connections is training its employment coordinators in all programs so they can be regionally based as opposed to program based.

Motion made (Abbott/Subach) to accept the WIOA Adult, Dislocated Worker and Youth program performance and contract reports. Motion carried unanimously.

2. DOC WtW

Ms. Mitchell reported there has been a huge improvement in enrollment numbers when compared to last program year. She stated a change in the way the state has allowed enrollments has made a big difference.

Motion made (Proudlock/Abbott) to accept the DOC Windows to Work report as presented. Motion carried unanimously.
3. Monitoring Activities

Ms. Mitchell reported that each year DWD pulls files to make sure they have been validated. This year, DWD found zero issues with the files that were pulled for the WDB’s service providers. Ms. Mitchell plans on sharing the most common issues the state found with other providers to make sure area providers keep on top of these common issues.

B. Contract and RFP Updates

1. WIOA Adult and Dislocated Worker

Ms. Sullivan reported the WDB received one response from Workforce Connections for the WIOA Adult and Dislocated Worker RFP. The response was reviewed and scored and received enough points to offer a contract to Workforce Connections. Ms. Mitchell reported the technical review committee decided to offer Workforce Connections a 1-year contract with the option to nullify the contract if deliverables laid out in the response are not being met at the end of the second quarter. Ms. Sullivan said the WDB will be meeting with Workforce Connections in the next couple of weeks to go over contract requirements.

2. DOC

Ms. Sullivan reported that the Department of Corrections approached the WDB asking how much money it would take for the WDB to operate the DOC WtW contract rather than contracting the grant out. There has been discussions on whether or not the WDB should operate the contract or contract it out. The WDB Executive Committee decided to wait to see what the allocations will be and go from there. The Executive Committee also discussed it might be a good idea to contract out one more year with other changes the WDB is facing this year.

3. OSO

Ms. Sullivan reported the Department of Labor decided a One-Stop-Operator needed to procured through a competitive bid process for each Job Center; in western Wisconsin this includes La Crosse and Tomah. The WDB let a no-cost RFP, which was responded to by one organization and it had a cost associated attached to the response. The WDB deemed this response non-responsive. A RFP was reissued and one response was received. This response still needs to be scored, which will be done by June 30, 2017.

C. Job Center Oversite

1. Job Center certification

Ms. Sullivan stated that new Department of Labor law requires all job centers to be certified each year, which will make sure all job centers meet certain criteria. The first certification needs to be completed by June 30, 2017. The WDB is still waiting for final word from DWD that the checklist the state put together is the final and can be used for certification.

2. One-Stop MOU

Ms. Sullivan explained that for the first time ever the amount of money it costs to operate a job center and who is going to be paid for it had to be calculated. Western Wisconsin had costs calculated for La Crosse and Tomah Job Centers. All partners agreed on the costs and how they would be paid. Some costs were based on square footage while others are based on full-time employees. The first draft of the MOU went to the state for a approval and a few tweaks need to be made.

Motion made (Powell/Grapes) to recommend approval of the One-Stop MOU contingent upon edits required by DWD. Motion approved unanimously.
D. Alignment of Resources and Activities
   1. Committee Member resource and program reports

Ms. Mitchell explained the purpose of this agenda item is for committee members to have a roundtable
discussion on items going on at member businesses that are relevant to job center operation. Ms. Balacek
suggested this agenda item be moved to the program report agenda item, which was agreed upon by
committee members. Ms. Powell spoke on how DVR programs can overlap with WIOA youth programming.
Ms. Subach reported the McDonald’s on George Street has been torn down and the new restaurant will
open later this fall. She said McDonald’s will be hiring for the George Street location throughout the
summer. New staff will be trained at other local McDonald’s locations. McDonald’s will be interviewing
throughout the summer each week at the Boys and Girls Club in La Crosse.

III. CONCLUSION
   A. Old Business
      None.
   B. New Business
      None.

IV. ADJOURN

Meeting adjourned at 12:07 p.m.

Respectfully recorded,
Jessie Foss, recorder

Respectfully submitted,
Patti Balacek

Present
Patti Balacek
Vicki Proudlock
Marina Abbott
Jessica Subach
Rebecca Grapes
Ellen Parker
Roxanne Powell

Not Present
Judy Berg
Kathleen Olson
Mary Kessens

Others Present
Kelly Norsten, Workforce Connections
Teresa Pierce, Workforce Connections
Matt Gaworski, WisCorps
Julie Mitchell, WDB
Beth Sullivan, WDB
Jessie Foss, WDB
### WisCorps June Monthly Report

#### Monthly Reporting Elements

<table>
<thead>
<tr>
<th>Planned New Enrollments</th>
<th>In School</th>
<th>Out of School</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actual New Enrollments</td>
<td>3</td>
<td>17</td>
</tr>
<tr>
<td>Current Active Caseload</td>
<td>3</td>
<td>17</td>
</tr>
<tr>
<td>Current Follow Up Caseload</td>
<td>14</td>
<td>29</td>
</tr>
<tr>
<td># in DF only</td>
<td>13</td>
<td>12</td>
</tr>
<tr>
<td># of youth currently in work experience</td>
<td>4</td>
<td>17</td>
</tr>
<tr>
<td># of youth having participated in a work experience to date PY16</td>
<td>12</td>
<td>41</td>
</tr>
</tbody>
</table>

**Actual number served to date in PY 16**

<table>
<thead>
<tr>
<th>67</th>
<th>71</th>
</tr>
</thead>
</table>

**Total planned to serve in PY 16**

<table>
<thead>
<tr>
<th>29</th>
<th>120</th>
</tr>
</thead>
</table>

#### Quarterly Reporting Elements

<table>
<thead>
<tr>
<th># with Lit/Num Gains</th>
<th>In School</th>
<th>Out of School</th>
</tr>
</thead>
<tbody>
<tr>
<td># Attaining credential</td>
<td></td>
<td></td>
</tr>
<tr>
<td># Placements</td>
<td></td>
<td></td>
</tr>
<tr>
<td># youth in apprenticeship</td>
<td></td>
<td></td>
</tr>
<tr>
<td># youth receiving financial literacy training</td>
<td></td>
<td></td>
</tr>
<tr>
<td># youth in entrepreneurial training/activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td># youth receiving career pathway info/activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td># ASSET and hard files internally monitored</td>
<td></td>
<td></td>
</tr>
<tr>
<td># employers/agencies contacted for outreach</td>
<td></td>
<td></td>
</tr>
<tr>
<td># Exits (to follow up)</td>
<td></td>
<td></td>
</tr>
<tr>
<td># Closes (done with follow up)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*** Please include a narrative in addition to the outputs requested above. The narrative should address the following: description of a special program element such as apprenticeship, entrepreneurial activities, career pathway info; breakdown of enrollment and outreach by county; successes and challenges.

*** All reports are due on the 15th of the month following the reporting month.
WIOA Adult and Dislocated Worker Monthly Overview PY 16 (7/1/16-6/30/17)  
June, 2017

<table>
<thead>
<tr>
<th>Adult &amp; Dislocated Worker</th>
<th>Planned 6/30/17</th>
<th>Actual 6/28/17</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>WIOA ADULT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Adult Served</td>
<td>107</td>
<td>108</td>
</tr>
<tr>
<td>• Adult-Career</td>
<td>104</td>
<td>161</td>
</tr>
<tr>
<td>• Adult-Training</td>
<td>40</td>
<td>63</td>
</tr>
<tr>
<td><strong>WIOA DISLOCATED WORKER</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Dislocated Workers Served</td>
<td>115</td>
<td>148</td>
</tr>
<tr>
<td>• DW-Career</td>
<td>120</td>
<td>191</td>
</tr>
<tr>
<td>• DW-Training</td>
<td>25</td>
<td>69</td>
</tr>
<tr>
<td><strong>CYCLE TIME</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Adult</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td>• Dislocated Worker</td>
<td>15</td>
<td>10.5</td>
</tr>
<tr>
<td><strong>WORK BASED LEARNING (WBL)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• OJT’s</td>
<td>6</td>
<td>-</td>
</tr>
<tr>
<td>• Transitional Jobs</td>
<td>10</td>
<td>2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Additional Contract Expectations</th>
<th>Adult</th>
<th>DW</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NCRC (NATIONAL CAREER READINESS CERTIFICATE)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Taking NCRC or other ERA</td>
<td>60</td>
<td>90</td>
</tr>
<tr>
<td>Achieved one level of NCRC or other ERA</td>
<td>11</td>
<td>30</td>
</tr>
<tr>
<td><strong>CAREER PATHWAYS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Achieved Industry Recognized Certificate</td>
<td>49</td>
<td>48</td>
</tr>
<tr>
<td><strong>CREDIT FOR PRIOR LEARNING (CPL)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Referred for CPL</td>
<td>5</td>
<td>21</td>
</tr>
<tr>
<td>Receiving Credits</td>
<td>0</td>
<td>6</td>
</tr>
</tbody>
</table>

### WIOA Participants Served by County PY 17

<table>
<thead>
<tr>
<th>County</th>
<th>Adults</th>
<th>DW</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buffalo</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Crawford</td>
<td>10</td>
<td>7</td>
<td>17</td>
</tr>
<tr>
<td>Jackson</td>
<td>6</td>
<td>7</td>
<td>13</td>
</tr>
<tr>
<td>Juneau</td>
<td>11</td>
<td>4</td>
<td>15</td>
</tr>
<tr>
<td>La Crosse</td>
<td>43</td>
<td>100</td>
<td>143</td>
</tr>
<tr>
<td>Monroe</td>
<td>24</td>
<td>13</td>
<td>37</td>
</tr>
<tr>
<td>Trempealeau</td>
<td>6</td>
<td>5</td>
<td>11</td>
</tr>
<tr>
<td>Vernon</td>
<td>7</td>
<td>11</td>
<td>18</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>108</td>
<td>148</td>
<td>256</td>
</tr>
</tbody>
</table>

### Job Center Customers thru 6/31/17

<table>
<thead>
<tr>
<th></th>
<th>Walk Ins</th>
<th>Phone Calls</th>
</tr>
</thead>
<tbody>
<tr>
<td>La Crosse</td>
<td>19,597</td>
<td>11,861</td>
</tr>
<tr>
<td>Monroe</td>
<td>3,466</td>
<td>2,287</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>23,063</td>
<td>14,148</td>
</tr>
</tbody>
</table>

### June Program Overview:

WIOA enrollments for both Adult and Dislocated Worker exceeded the goals for the program year. Services throughout the region remained on track in alignment with the goals set for the program year despite shifts in energies to account for the high level of dislocations requiring significant staff energies and focus. The highest numbers served are consistent with the areas that house comprehensive job centers and larger populations. A physical presence in all counties remained throughout the program year.

June marked a turning point in work based learning opportunities. Significant efforts were made on contacting businesses and to educate on Transitional Jobs and On the Job Trainings. Efforts towards obtaining Transitional Jobs came to fruition with the start of the first two Transitional Jobs. Two OJT’s were set to the point of contracting and were also pulled. One was terminated due to the participant failing a background check for a traffic violation which will be cleared in several months and at that point the participant would become eligible with the company again. The other contract was halted due to the business electing to hire the individual. The foundations for another OJT are in the works to start in July when the hiring manager returns from vacation.

In June recruitment was also conducted and concluded to fill the vacancy in Crawford county as well as Tomah. Crawford county staff will begin training August as we continue with our planned Universal Case manager strategy for services. Vernon county staff are currently beginning training on WIOA while La Crosse based staff maintain services in both Vernon and Crawford. Tomah staff will be in place August 1st as well as planned.

### Dislocated Worker Participant Quote:

“The outcome was FANTASTIC. I couldn’t ask for any better help. I think I have a valuable tool to secure employment the rest of my working years, in case something like this happens again.” - David, River Steel
Windows to Work

Monthly Progress Report

Agency: Workforce Connections, Inc.

Program Provider: Sandy Turner – Workforce Connections, Inc.

Reporting Period: July 2017

Institution Program
Workforce Connections, Inc. provides a Windows to Work Program at New Lisbon Correctional Institution. Data for the last month:

<table>
<thead>
<tr>
<th>Number of Group Sessions Provided at New Lisbon Correctional Institution</th>
<th>Current Institution Enrollment</th>
<th>New Enrollments Last Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>6</td>
<td>2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>County</th>
<th>Number Enrolled in Education/Technical Program</th>
<th>Number Currently Employed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Juneau</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>La Crosse</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Monroe</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Institution Program
Workforce Connections, Inc. provides a Windows to Work Program at Jackson Correctional Institution. Data for the last month:

<table>
<thead>
<tr>
<th>Number of Group Sessions Provided at Jackson Correctional Institution</th>
<th>Current Institution Enrollment</th>
<th>New Enrollments Last Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>8</td>
<td>0</td>
</tr>
</tbody>
</table>

Community Program/Participation
Workforce Connections, Inc. oversees participants who have released to the counties listed below. Data for the last month:

<table>
<thead>
<tr>
<th>County</th>
<th>Number Enrolled in Education/Technical Program</th>
<th>Number Currently Employed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buffalo</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Jackson</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Trempealeau</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Vernon</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
2016-17 WIOA
COORDINATED MONITORING REPORT
Program, Fiscal, and Equal Opportunity

Western Wisconsin Workforce Development Board

DWD Compliance Officers:
Equal Opportunity: David Duran (Lead)
Fiscal: Annette Meudt (Lead), Sumanpreet Ghuman, Jean Bink-McGrath, Babucarr Kebbeh
Program: Stephanie Elmer (Lead), Sandra Hiebert, Aaron Sarbacker

On-site Monitoring Dates:
April 24 – April 27, 2017

Issued on July 24, 2017 by the Department of Workforce Development/ Division of Employment & Training.
EXECUTIVE SUMMARY

Annual on-site monitoring is an important activity in the overall management of Wisconsin’s Workforce Investment Act (WIA) and Workforce Innovation and Opportunity Act (WIOA) programs.

The purpose of the review is to:

- Ensure the programs comply with appropriate policies and procedures and operate within the parameters established by law, regulations, the State WIOA Plan, the Local WIOA Plan, Equal Opportunity (EO) and Nondiscrimination policies, and program guidelines.
- Assess the quality of services provided to program participants and employers, and where appropriate, make recommendations for improvement.
- Evaluate the management and administration of WIA/WIOA funded grants with the Department in order to determine if program operations are compliant and whether the Workforce Development Board (WDB) is on track to achieve grant goals and outcomes.
- Provide technical assistance as needed or requested.
- Identify system-wide issues requiring policy or program review and resolution.
- Identify positive practices and share with others in the workforce development system.
- Assess impacts of workforce programs for customers within the workforce development area.
- Provide technical assistance for WIOA readiness and implementation

SCOPE OF REVIEW

The following items and activities were part of the review:

- Interviews with WDB staff,
- Review of local WDB practices and policies, and
- Review of a sample of adult, dislocated worker (DW), and youth and young adult participant case files.

The review of Western Wisconsin WDB (WWWDB) was conducted during the period of April 24 – 27, 2017, with an exit conference held on April 27, 2017. The Coordinated Review Team consisted of the following monitors:

- EO: David Duran (Lead)
- Fiscal: Annette Meudt (Lead), Jean Bink-McGrath, Sumanpreet Ghuman, and Babucarr Kebbeh
- Program: Stephanie Elmer (Lead), Sandra Hiebert, and Aaron Sarbacker
TERMINOLOGY AND OVERVIEW MATRIX

Terms utilized in this report were identified in the United States Department of Labor's (US DOL) "Ten Steps to Developing an Effective State Monitoring System." The matrix below identifies any findings, areas of concern, and positive practices by topic area.

- **Finding** - the identification of a specific federal/state law, policy or procedure which the WDB has failed to comply with that is serious enough to require corrective action.
- **Required Action** - step or steps that are necessary to address a Finding. It is the Department of Workforce Development's (DWD) expectation that the WDB will develop a corrective action plan, as appropriate.
- **Area of Concern** - administrative or management practices that do not represent instances of non-compliance but could become compliance problems in the future, if not addressed.
- **Recommendation** - suggested action steps to address Areas of Concern that, in DWD's opinion, will improve the program or practice. The WDB is not required to adopt DWD’s specific recommendation.
- **Positive Practice** - used to highlight positive aspects of programs that may be shared with other WDBs to help improve their programs.

<table>
<thead>
<tr>
<th>AREA</th>
<th>FINDING</th>
<th>AREA OF CONCERN</th>
<th>POSITIVE PRACTICE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-1 Real Property</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-2 Equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-3 Procurement</td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>A-4 Monitoring and Contracts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-5 Internal Controls</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-6 Written Fiscal and Personnel Policies</td>
<td></td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>A-7 Audits and Audit Resolution</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-8 Budget Controls</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-9 Personnel</td>
<td></td>
<td></td>
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<tr>
<td>A-10 Cash Management</td>
<td></td>
<td></td>
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<tr>
<td>A-11 Fiscal Reporting</td>
<td></td>
<td>1</td>
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</tr>
<tr>
<td>A-12 Indirect Cost Rate</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>A-13 Voucher Testing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-14 Participant Files</td>
<td></td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>A-15 Equal Opportunity</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A-16 Eligibility and Services</td>
<td></td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>A-17 On-the-Job (OJT) File Review</td>
<td></td>
<td></td>
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<tr>
<td>A-18 Oversight of Service Providers</td>
<td></td>
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<td></td>
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<tr>
<td>A-19 Performance Measures</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>A-20 Selective Service Registration</td>
<td></td>
<td></td>
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<tr>
<td>A-21 Training Services</td>
<td></td>
<td></td>
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<tr>
<td>A-22 Work Experience Agreement</td>
<td></td>
<td></td>
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<tr>
<td>A-23 Youth and Young Adult Monitoring Guide</td>
<td></td>
<td></td>
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</tbody>
</table>
I. FINDINGS

There are three Findings related to fiscal management and one Finding related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-3 PROCUREMENT (FISCAL)

FINDING 1:

- Procurement Must Be Conducted with Full and Open Competition.
  - STANDARD: Uniform Guidance 200.319(a) "All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section."
  - CONDITION (CAUSE AND EFFECT): WWWDB's policy for the Technical Review of Proposals "reserves the right to make selections based solely on the final scores or to take into consideration of other relevant factors". Procurement cannot be full and open if criteria outside of the procurement process are used to make the decision.
  - QUESTIONED COST: None
  - RECOMMENDATION: The Request for Proposal (RFP) be reissued after the first year of service ensure full and open competition

- Criteria for contract selection must be published in the RFP and used in the selection process. This is a repeat finding.
  - STANDARD: Uniform Guidance 200.319(c)(2) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.
  - CONDITION (CAUSE AND EFFECT): WWWDB's policy for the Technical Review of Proposals "reserves the right to make selections based solely on the final scores or to take into consideration of other relevant factors". By definition, these relevant factors would have been excluded from the RFP or their consideration would have occurred during the rating process.
  - QUESTIONED COST: None
  - RECOMMENDATION: The contract for Youth not be renewed and a new RFP be issued after one year to ensure full and open competition.

- WWWDB did not document how the responsible firm constitutes the most advantageous to the program.
  - STANDARD: Uniform Guidance 200.318(a)(7) "Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program."

*NOTE: These are all repeat findings
FINDING 2:

- Required Conflict of Interest Policy is Not Established.
  - **STANDARD:** Uniform Guidance 200.318 (c) (1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.
  
  **CONDITION (CAUSE AND EFFECT):** The WWWDB Personnel Policies allows an employee to have an interest in a contract paid by WWWDB if the contract was competitively bid. Uniform Guidance specifically prohibits an employee, officer, or agent from participating in the selection, award, or administration of a contract.
  
  **QUESTIONED COST:** None
  
  **REQUIRED ACTION:** WWWDB is required to update its Personnel Policy to reflect current regulations.

- Required Allowability Policy is Not Established. This was an Area of Concern in 2015-2016.
  - **STANDARD:** Uniform Guidance 200.302 (b) (7) "The financial management system of each non-Federal entity must provide for the following: Written procedures for determining the allowability of costs. . ."
  
  
  **QUESTIONED COST:** None
  
  **REQUIRED ACTION:** WWWDB is required to update its policy to reflect current regulations.

- Required Record Retention Policy is Not Established. This was an Area of Concern in 2015-2016.
  - **STANDARD:** Uniform Guidance 200.333 "Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years." WIA Policy Update 07-05 - A program participant files must be retained for seven consecutive years after the participant exists from US DOL funded programs.
  
  **CONDITION (CAUSE AND EFFECT):** The WWWDB Financial Policies and Procedures Manual states the record retention policy for the sub-award but does not include record retention policy for the WWWDB. The WWWDB Financial Policies and Procedures Manual requires the sub-award to retain records for three years. DWD WIA Policy Update 07-05 requires a seven-year retention period for participant files.
  
  **QUESTIONED COST:** None
  
  **REQUIRED ACTION:** WWWDB is required to update its policy to reflect the circumstances and requirements for both the three-year and the seven-year record retention requirement.
A-11 FISCAL REPORTING

FINDING 3: Unliquidated Obligations are not being reported on the Financial Status Reports (FSR).


CONDITION: WDB has not been reporting obligations with service providers on their FSRs.

QUESTIONED COST: None

REQUIRED ACTION: Any Obligations must be reported on the FSR's monthly.

A-16 ELIGIBILITY AND SERVICES

FINDING 4: DW eligibility documentation issue

STANDARD: DW eligibility must comply with WIOA Federal Regulations, 20 CFR 680.120 – 680.130 and the WIOA Title 1 Eligibility Determination and Documentation Technical Assistance Guide (TAG), pages 9-10. In order to receive services in the DW Program, individuals must:

1. Meet general eligibility criteria;
2. Meet the Federal definition of "DW" at WIOA Sec 3(15); and
3. Meet all three State eligibility criteria.

Appropriate documentation related to eligibility must be retained in the participant file, and applicable data entered into Automated System Support for Employment and Training (ASSET). Eligibility requirements must clearly, and without question, be satisfied and documented prior to the provision of any Individualized, Training, or Supportive services, and especially before obligating or vouchering any funds for the individual.

Failure to meet eligibility requirements could result in disallowed costs.

CONDITION: The following files contained eligibility problems:

PIN 1876046: Participation date is 02/16/2016, but according to case note #4465763 dated 3/17/2016: Career Planner requested Unemployment Insurance (UI) documentation and DD-214. Despite this case note:
- There is no additional case note indicating when those documents were received.
- Documents are present in file, but are not date stamped.
- UI Documentation in file has a "mailed date" of 02/25/2016 – after the participation date.
- Selective Service documentation in the file is dated 04/16/2016 – after the participation date.

The participant received Career, Staff Assisted, Individualized and Supportive services prior to the completion of the eligibility determination. This includes issuance of two vouchers (#17783 dated 3/19/2016 – 6/1/2016 for CMQ/OE Certification preparation in the amount of $1038) and (#17782 dated 3/19/2016 for transportation assistance in the amount of $180).
PIN 630814: There is inadequate documentation of "unlikely to return to a previous industry or occupation".

PIN 1532808: DW Federal Criterion #1.a was selected, but the participant file does not contain UI documentation.

**QUESTIONED COSTS:** All direct costs (training, supportive services) spent on ineligible participants must be reimbursed by the board to the WIOA Program with non-federal funds.

**REQUIRED ACTIONS:** PIN 1876046—WWWDB must provide clear documentation to prove the eligibility criteria were met prior to any direct cost expenditures. If no documentation can be produced, the Board must provide an itemized list of all direct costs spent on the participant.

PIN 1532808—WWWDB must provide UI documentation to provide the eligibility criterion was met, or provide proof that the participant meets another DW Federal Criterion. The participant file does show indications that there could be eligibility under Federal Criterion #2. Corrective action for this case would be to either provide the UI documentation, or properly identify the eligibility under criterion two, and submit the ASSET staff request to change the Federal Criterion.

Once this information is provided, Division of Employment and Training (DET) will instruct WWWDB on when and how to reimburse any disallowed costs.

**RECOMMENDATIONS:** Career Planners should ensure that all required documents are received and validated prior to completing enrollment in ASSET. Career Planners should also ensure that information gathered from the individual's signed application accurately reflects the information that is entered into ASSET. Documents received by career planners, especially those related to eligibility, should be date stamped at the time of receipt, and corresponding case notes should be entered in ASSET.

**I. AREAS OF CONCERN**

There are three Areas of Concern related to fiscal management and four Areas of Concern related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

**A-3 PROCUREMENT**

**AREA OF CONCERN 1: Conditions for noncompetitive proposals.**

**STANDARD:** Uniform Guidance 200.320(f)

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

1. The item is available only from a single source;
2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
3. The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
4. After solicitation of a number of sources, competition is determined inadequate.
CONDITION: (CAUSE AND EFFECT):
There are four conditions under which a non-competitive proposal can be used. WWWDB has added two more conditions which are not authorized.

QUESTIONED COST: None.

RECOMMENDATION: WWWDB is required to eliminate the two unauthorized conditions for a non-competitive proposal.

AREA OF CONCERN 2: Consideration of special populations.

STANDARD: Uniform Guidance 200.321(a)
The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

CONDITION: (CAUSE AND EFFECT):
WWWDB's Financial Policy and Procedures Manual considers small and minority-owned businesses in purchasing decisions, thereby excluding by omission women's business enterprises, and labor surplus area firms which may cause difficulties in the future.

QUESTIONED COST: None.

RECOMMENDATION: WWWDB is required to include women's business enterprises and labor surplus area firms to their Financial Policy and Procedures Manual.

A-11 FISCAL REPORTING

AREA OF CONCERN 3: Leveraged resources are not being reported on the FSR's.


CONDITION: WDB's are required to report any leveraged resources. Leveraged funds are all resources used to support the WIOA Title 1 Grant activities and desired outcomes.

RECOMMENDATION: WDB must work with their service providers to compile and report the leveraged resources on all WIOA TITLE 1 Grants.

A-14 PARTICIPANT FILES

AREA OF CONCERN 4: Low income determination and documentation problems

STANDARD: Low Income Determination must be completed per WIOA Section 3(36)(A)(ii)(II), and 3(36)(B), as well as WIOA Final Rules Section 681.280. WIOA Title I programs have two uses for income determinations: First, is the eligibility for the Youth/Young Adult program, where the information is a part of the in-school and out-of-school eligibility criteria. The second is to determine priority of service for the Adult Program.

CONDITION: The following issues were identified during the file review:
PIN 1532808, DW
- Income in participant file is not calculated for the past six months or annualized

PIN 1671084, DW
- Family composition of three includes participant's mother, who does not meet the WIOA definition of family, and includes the mother's social security income. Family size should be two, to include the participant and her son. Participant's income for last six months is $6543.83, annualized=$13087.66—for a family of two, this income would fall below 70% of Lower Living Standard Income Level (LLSIL), which makes the ASSET entry incorrect.

PIN 140284, Adult
- Family size of two includes grandfather, who does not meet the WIOA definition of family. Family size should = one.
- Grandfather's income (railroad pension) is used incorrectly in income calculation, which put the participant over Federal Poverty Level (FPL)/LLSIL.
- Participant receives a Trust Fund, but Trust Fund income was not clearly documented or used in income calculation.
- ASSET entry regarding income could be incorrect based on inaccurate determination of family size and use of non-family-member's income.

RECOMMENDATION: The WWWDB has very strong forms, which are designed to properly capture appropriate income information for eligibility determination and ASSET reporting. Career Planners should ensure that they understand the proper definitions and terms for determining family size, and understand whether to include that income when completing the forms.

AREA OF CONCERN 5: ASSET Reporting Errors

STANDARD: ASSET is used to track data for customers receiving services under the WIOA programs. The accuracy and completeness of data is critical for accurate federal reporting, resource planning, monitoring/evaluation, and state and local program management. WDBs should ensure that ASSET reporting complies with WIOA policies, the ASSET User's Manual, and local WDB policies.

The Federal DOL requires all states to complete annual data validation to verify that randomly selected demographic, performance, and service-related data is accurate and agrees with documents contained in the corresponding participant file and ASSET case notes. It is especially crucial that data fields directly impacting performance outcomes and/or the Statistical Adjustment Model be completed accurately. ASSET Manage Services must show accurate actual open and close dates for services provided to participants. Annual data validation requires some services to be an exact date match (e.g. first day of staff-assisted service, training start and end dates, etc.) WIA Policy 13-05, issued 2/19/2014, indicates that other services should be relative to when the service started and ended (e.g. supportive services, incentives, job search, etc.). Acceptable data validation sources can be found in the Eligibility TAG, WIA Policy Manual, and Training and Employment Guidance Letter (TEGL) 22-15. A complete list of services directly impacting performance and/or affecting the Statistical Adjustment Model can be found in the Performance TAG.
WIA Policy 06-07, issued 6/29/2006, states that qualifying certificates/credentials must be reported in ASSET Manage Follow-Ups and documentation validating certificate/credential attainment should be placed in the participant file. Reporting credentials in ASSET is crucial since credential attainment is a performance indicator under WIOA.

In general, information entered in ASSET should correspond directly with documentation contained in the participant file, and information entered in case notes, and vice versa.

**CONDITION:** The following PIN numbers and the assorted issues were identified during the file reviews conducted during the monitoring:

**PIN 1876046, DW**
- Individual Employment Plan (IEP) in file created and signed 2/16/2016; date does not match ASSET service date 2/23/2016
- IEP in file dated 3/22/2016 does not have corresponding ASSET service
- IEP in file dated 4/25/2016; date does not match ASSET service date 4/26/2016

**PIN 1205142, DW**
- IEP signature page present in file dated 4/8/2017; no corresponding service in ASSET
- Voucher #17234 in participant file for training; no corresponding service in ASSET
- Occupational Classroom in ASSET dated 9/30/2016; no details in case notes or participant file to support the training
- Summer training is mentioned in case notes; but no corresponding service in ASSET

**PIN 1532808, DW**
- Job Search Knowledge Scale (JSKS) and Liberal Education and America's Promise (LEAP) assessments present in file; no corresponding Assessment-Comprehensive & Specialized service(s) in ASSET
- Certified Nursing Assistant (CNA) License dated 6/20/2014 was entered in ASSET Manage Follow-ups Credentials as an Occupational Certificate (wrong category)
- CNA Certification present in file dated 12/17/2013 was not entered in ASSET Manage Follow-ups Credentials
- IEP in file dated 5/13/2013; no corresponding service in ASSET
- Voucher #10794 dated 4/21/2014-5/21/2014 for $70 for CNA exam; no corresponding service in ASSET
- Voucher #12528 dated 12/11/2014-12/14/2014 for $68 for Transportation Assistance; no corresponding service in ASSET
- Voucher #15754 dated 10/21/2015-11/13/2015 for $200 for scrubs/attire; no corresponding service in ASSET
- Other Support Service in ASSET dated 1/12/2015-2/28/2015 comments show for mileage—should be entered as Transportation Assistance

**PIN 1850081, DW**
- Rapid Response Grant fields in ASSET Manage Programs not completed appropriately
PIN 1671084, DW
- Planned Gaps in Service entered in ASSET dated 9/7/2016-12/12/2016, and 12/13/2016-Present—it is unclear why the Planned Gap was closed on 12/12/2016 and reopened the next day, instead of continuing as one service.
- Credential date in ASSET Manage Follow-ups credential (12/18/2015) does not match date of certification in file (12/17/2015)
- Credential in file for Western Technical College Frontline Services dated 8/19/2015 not entered in ASSET Manage Follow-ups Credential
- IEP in file dated 12/18/2015; ASSET service dates (12/15/2015-12/28/2015) do not correspond
- IEP in file dated 7/18/2016 and signed 8/1/2016; ASSET service dated 8/2/2016 does not correspond
- In training already at time of intake—should have Occupational Classroom service open dated 6/29/2015-8/22/2015 with Other Non-WIOA fund source to reflect accurate activities

PIN 1899340, DW
- Rapid Response Grant (RRG) fields in ASSET Manage Programs not completed accurately
- Three separate services in ASSET for Housing Assistance—two of the services include reference to the same voucher #, one using the WIODW fund source and the other using the RRG fund source

PIN 1901393, DW
- RRG fields not completed accurately in Manage Programs
- Multiple transportation vouchers present in file but only one service entered in ASSET
  - Voucher #18547, $100, 5/5/2016-5/13/2016
  - Voucher #18637, $500, 5/1/2016-5/31/2016

PIN 1682863, Adult
- IEP in file dated 12/1/2014; no corresponding service in ASSET
- IEP in file dated 8/27/2015, ASSET service date 9/1/2015 does not match

PIN 340265, Adult
- Skills Upgrading & Retraining service in ASSET dated 4/20/2015-6/30/2015 has "Other" fund source, but has an established Individual Training Account (ITA)
- Welding certification training was entered as Skills Upgrading & Retraining, but should be Occupational Classroom (Other Non-WIA funding, no ITA)
- Participant was already in training at participation date—start date of training service should be 4/21/2015 (not 4/30/2015)
- Transportation Assistance service dated 4/27/2015-9/30/2015—dates do not match voucher dates in the file
  - #13776, $600, 4/22/2015-6/25/2015
  - #14453, $620, 7/6/2015-7/31/2015
- Service dates should be 4/22/2015-7/31/2015
Multiple Transportation Assistance services entered in ASSET for the same vouchers. Services opened 4/27/2015-9/30/2015 and 7/6/2015-7/31/2015.

PIN 855385, Adult
- Transportation Assistance vouchers issued, but no corresponding services entered in ASSET
  - #19367, $45.50, 7/13/2016-7/29/2016 to Ace Cab Co.
- #14371, $238.99, 7/3/2015-7/10/2015 to Denny's Truck & Auto Service—dates on voucher do not match date (7/6/2015) entered in ASSET

PIN 1886175, Adult
- Case notes document referral to Division of Vocational Rehabilitation, but no corresponding referral service in ASSET

PIN 1884486, Adult
- Resume development indicated in file and case notes; no corresponding service in ASSET
- Referrals to public assistance, medical assistance, career counseling, training, apprenticeship, and NCRC were made, but not documented appropriately in ASSET.

PIN 140284, Adult
- Employment status in ASSET is "Employed" but documentation in the participant file shows the only income is from a Trust Fund. Should be "Not Employed"
- Participant is co-enrolled in FoodShare Employment and Training program, but corresponding service not entered in ASSET

RECOMMENDATION: The WDB must correct the issues listed above for any participants who are still active. These errors should be discussed with career planners and the importance of completing data fields correctly in ASSET should be reiterated. ASSET Staff Requests must be submitted to correct all errors related to performance and follow-up for closed files. Career planners should also ensure that information gathered from the individual's signed application, or documented elsewhere in the participant file, accurately reflects the information entered in ASSET.

The WDB should develop and implement quality assurance measures to ensure that all data fields related to performance are completed accurately. Career planners should be trained on these procedures.

AREA OF CONCERN 6: Case Management Issues

STANDARD: A participant's success comes from within but also depends on effective case management built on a solid foundation of comprehensive qualitative and quantitative assessments and development of strong IEPs for Adult and DW participants, and Individual Service Strategies (ISS) for Youth participants. One way to measure case management practices during monitoring is to look at the quality and frequency of IEP and ISS documents, frequency of career planner contact with the participant, and the quality and frequency of ASSET case notes. In the absence of strong assessment and IEP/ISS development processes, quality documentation of those processes, and regular participant contact, individual outcomes as well as local and state performance outcomes can suffer.
Per the WIA Policy Manual, the IEP/ISS is an ongoing strategy jointly developed, signed and dated by the participant and the case manager. The IEP/ISS documents and describes the participant's employment goals, achievement objectives, determination of need for training, and the appropriate combination of services for the participant to achieve the objectives. IEPs/ISSs should be reviewed periodically and updated as needed (a minimum of every six months is recommended).

The WDB's Local Plan VI.C.9 indicates that contact with active participants will occur at minimum, every three months. The contact must be documented in case file/notes and ideally signed by case manager and participant. If no signature, reason why not must be documented in case notes.

The WDB's Local Plan VI.H.13. indicates that youth program participants are required to be reviewed/updated at minimum, every three months. This must be documented in case file/notes and ideally signed by case manager and participant. If no signature, then a reason why it is not signed must be documented in case notes.

Both the WDB Local Plan and DWD require that all contacts are documented in ASSET case notes.

WDBs must ensure that case management and ASSET entry comply with federal, state, and local policies. DET expects to see the following practices in place when conducting participant file and ASSET review:

Case notes must be complete; align with ASSET Manage Services, participant file documentation, and that participant's employment plan; and are updated in accordance with the WDB's Local Plan.

IEP and ISS documents must be aligned with ASSET Manage Services, participant file documentation, and ASSET case notes; be signed and dated by the participant and case manager; and be updated in accordance with the WDB's Local Plan. Priority of Service must be provided in accordance with federal, state, and local policy. Per Administrators Memo 16-06 dated July 22, 2016, "all participants enrolling in the Adult Program, who are not low income or public assistance recipients, must complete the screener DETW-18156-E to determine if an individual is basic skill deficient."

Non-Traditional Occupations (NTO) must be discussed with all participants. WIOA Federal Regulation 682.200(b)(1) states that one of the required statewide employment and training activities includes providing information about the State list of eligible training providers (including those providing non-traditional training services). Furthermore, ASSET Manage Programs/Title 1 contains two data fields pertaining to NTO; one asks if it was discussed with the participant and the other asks if the participant was interested. Case managers are expected to complete both data fields.

When a participant is served by multiple funding sources, coordination between program case managers is required to maximize services with available funds. WIOA Federal Regulation 680.230(a)(1) states that WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training. And 680.230(b) places responsibility on the one-stop center to coordinate available training funds. 680.330(e) allows for coordination of ITA funding with funding from other programs.
Participants should be informed at enrollment of how often and under what conditions they are required to contact their career planner. WDBs should have policies and procedures in place to routinely monitor that all participants are engaged in their services, are staying in contact with their career planner, and that ASSET Manage Service dates are not artificially extended. Cases of lost contact or disengagement in services should result in exit according to the local policies and procedures.

**CONDITION:** The following PIN numbers and the assorted issues were identified during the file reviews conducted during the monitoring:

PIN 1876046, DW
- Follow-ups are not documented in Manage Follow-ups Follow-up status
- Follow-up activities are not adequately case noted in ASSET

PIN 630814, DW
- IEP not updated every three months as required by local policy; 4/15/2015-9/30/2015, 9/30/2015-8/8/2016
- IEP update in file dated 11/14/2016, several months after system-generated exit date of 8/16/2016
- Transportation Assistance was provided by Trade Adjustment Assistance (TAA) 8/24/2015-2/22/2016; and by WIOA 10/1/2015-10/31/2015 during the same timeframe. TAA was funding transportation for training, and WIOA paid transportation for employment-related activities during the same timeframe. Shows poor coordination of services.

PIN 906822, DW
- IEP not updated every three months as required by local policy; 3/17/2016-8/22/2016-no update
- IEP does not identify supportive service needs

PIN 1530105, DW
- IEP does not identify Childcare Assistance as a necessary supportive service.

PIN 1205142, DW
- IEP not updated every three months as required by local policy; 12/31/2015-5/6/2016, 5/6/2016-1/5/2017
- IEP dated 1/5/2017 is not signed by the participant

PIN 1532808, DW
- Employment status in ASSET (Employed) does not match documentation in participant file showing the participant had received notice of termination/layoff at intake
- NTOs in ASSET marked "No"; does not match signed Participant Rights & Responsibilities form in file
- Follow-ups not completed accurately—not entered in Manage Follow-ups Status, no case notes entered after the exit date, follow-up services have planned dates only
PIN 1671084, DW
- IEP not updated every three months as required by local policy; 6/29/2015-12/18/2015, 12/18/2015-7/18/2016, 7/18/2016-Present

PIN 1901393, DW
- IEP does not clearly identify participant's career goal(s)
- IEP not updated every three months as required by local policy; 4/25/2016-3/22/2017

PIN 1682863, Adult
- IEP not updated every three months as required by local policy
- IEP does not document need for supportive services

PIN 1539560, Adult
- IEP not updated every three months as required by local policy
- First ASSET case note entered is several months after participation date

PIN 340265, Adult
- IEP not updated every three months as required by local policy; 4/28/2015-no update through exit date
- Gaps in case notes: 12/2/2015-6/13/2016, 8/22/2016-Present (per CN #4727340 dated 2/17/2017 indicates participant requested no contact)

PIN 855385, Adult
- Initial IEP developed 6/1/2015—several months after participation date
- IEP not updated every three months as required by local policy; 6/1/2015-4/13/2016, 4/13/2016-exit
- Q1 follow-up not entered in Manage Follow-ups Status
- Supportive service need not documented on IEP
- Case note #4597589 dated 9/1/2016 indicates participant will be exited to employment—this does not match the system-generated exit date of 11/4/2016. Case Management and Assisted Job Search & Placement services remained open in ASSET, but no services were being provided during that timeframe.

PIN 653406, Adult
- IEPs not updated every three months as required by local policy; 5/31/2016-11/3/2016, 11/3/2016-3/22/2017
- IEP updates dated 11/3/2016 and 3/22/2017 are not signed
- WIOA funded CNA test, but no test results present in file

PIN 1886175, Adult
- Supportive services provided (steel toed boots) were not identified in the IEP
- Final IEP shows Welding certificate as a goal, but case note #4533951 states he finished training and did not like it.
- IEP not updated every three months as required by local policy.
- Assessment results (social) not used to information career/training goals (Welding)

PIN 1743916, Adult
- IEP not updated every three months as required by local policy
PIN 1884486, Adult
- IEP does not identify specific career goals
- Case note #4457908 dated 3/7/2016 indicates the participant's career goal is Automotive Technology—this is not clearly reflected on the IEP.

PIN 140284, Adult
- IEP not updated every three months as required by local policy; 2/18/2016-9/30/2016, 9/30/2016-1/17/2016
- IEP does not include the participant's career/training goals
- Gaps in case notes: 10/21/2016-1/17/2017

RECOMMENDATION:
The WDB must reiterate to career planners the importance of documenting all services, including supportive services, on the IEP/ISS, and in ASSET Manage Services, with the correct fund source.

The WDB should also require that career planners review WIA Policy 13-05 regarding supportive services procedures and documentation.

The WDB should reinforce to career planners the purpose of the IEP, what it should contain, and that it be reviewed every three months per local policy. If the participant is actively engaged in his/her IEP activities and there are no changes since the last version, the career planner can report this via an ASSET case note or make a notation on the IEP in the participant file. The IEP should be updated, and jointly signed and dated if the participant has a significant change in his/her original employment goals and services. If the participant is not engaged or in contact with his/her case manager for longer than 90 days, the participant should be exited.

The WDB must address all errors listed above and make corrections for participants who are still active.

The WDB should also develop or revise policies and procedures to address the above concerns, train its staff and career planners accordingly, and ensure that sufficient oversight occurs on an ongoing basis.

Area of Concern 7: File documentation issues

STANDARD: The DWD Guide to WIOA Title I Eligibility Determination and Documentation, WIOA Title 1B Adult and DW Programs Guide to Participant Case File Documentation, and WIOA Title 1B Youth Program Guide to Participant Case File Documentation provide the appropriate types of documentation that must be included in each participant's file.

Supportive services must be documented in the following way:

The participant file should contain documentation to support the need for assistance. For Transportation Assistance, this should include the route of travel, related cost of travel, training/attendance/job search logs to support the frequency of assistance, and a tracking log of when and how much assistance was provided.
Appropriate Supportive Services should be entered in ASSET with dates relative to when the service was provided.

The Supportive Service must be included in the participant's IEP/ISS.

Each Supportive Service must be documented in ASSET customer notes.

All Supportive Services must comply with WIA Policy 13-05, issued 2/19/2014, and the local supportive services policy.

**CONDITION:** The following PIN numbers and the assorted issues were identified during the file reviews conducted during the monitoring:

PIN 906822, DW
- Vouchers in file for supportive services (uniform items), but no supporting receipts in the file

PIN 1205142, DW
- IEP signature page in file dated 4/8/2017—the rest of the document is missing
- Comments in the Skills Upgrading & Retraining service do not correspond with vouchers present in the participant file

PIN 1532808, DW
- JSKS and LEAP assessments in file do not include the date of completion
- IEP documented dated 11/17/2014 not signed by participant
- No class schedules or other documentation for Spring 2014 training semester. Voucher #9905 dated 1/7/2014-4/25/2014 for $500 for Spring 2014 Medical Assistant training.
- Voucher #10056 dated 1/27/2014-2/28/2014 for $110 for Medical Assistant required supplies—no receipts or other supporting documentation.
- Voucher #10969 dated 5/5/2014-8/19/2014 for $408.87 for Summer 2014 Medical Assistant training—no class schedule or other supporting documentation.

PIN 1671084, DW
- No vouchers or other documentation to support that participant was in training after Summer 2016. ASSET Services remain open 7/1/2016-8/31/2016 and 9/1/2016-9/7/2016.
- IEP update in file dated 12/27/2015 is not signed

PIN 1899340, DW
- IEP in file dated 1/31/2017 is not signed by participant or case manager

PIN 1901299, DW
- Occupational Classroom service entered in ASSET (using WIODW fund source w/ ITA established), but no evidence in participant file or case notes that participant received any funding for the training.
- Insufficient documentation to justify Planned Gap in Service

PIN 1901393, DW
- IEP update in file dated 3/22/2017 is not signed by participant
- IEP Review service in ASSET dated 9/22/2016—no corresponding document in file
- Other Support Service in ASSET dated 5/5/2016 for Interview Clothing/Shoes—no corresponding voucher in file
- Other Support Service in ASSET dated 5/16/2016 for Steel-toed Boots—no corresponding voucher in file
- Voucher #19451 dated 7/18/2016 for Other Support Service (non-skid shoes)—no receipt or other corresponding documentation
- Other Support Service in ASSET dated 6/16/2016-6/30/2016 for required work clothes for $300 at Kohls—no corresponding voucher in file
- Other Support service in ASSET dated 7/1/2016-8/5/2016 for required work clothes for $300 at Kohls-no corresponding voucher in file

PIN 1682863, Adult
- Credential entered in ASSET Manage Follow-ups Credentials, but no supporting documentation in file

PIN 1539560, Adult
- O*Net assessment in file only includes first name of participant, and does not include a completion date
- Initial assessment does not identify participant by name or PIN
- IEP service in ASSET dated 4/29/2013—document is not in file
- Transportation Assistance provided—no mileage logs or other supporting documentation in participant file

PIN 1743916, Adult
- TABE in file has no name or results

PIN 1884486, Adult
- Voucher #18880 for $75 for clothing at Kohl's in file—no supporting receipt or other documentation

RECOMMENDATION: The WDB should review with career planners the documentation TAGs referenced in the Standard above to determine appropriate documents to include paper files, and ensure ASSET entries are consistent with paper files, and vice versa. Career planners should ensure that forms contained the participant file are filled out completely, and forms requiring signatures/dates should be signed and dated by all required parties. File documentation for Supportive Services must be complete and arranged so it can easily be associated with its corresponding entry in ASSET Manage Services. Supportive Services should be entered separately in ASSET Manage Services instead of being grouped together as one entry over an extended period. Dates in ASSET Manage Services must reflect when the supportive service was provided. It is also recommended that career planners make a notation in the "Comments" box on the ASSET Manage Service screen briefly describing the service and cross-referencing authorization vouchers or Statement of Needs forms found in the participant file.

The WDB should review their local supportive services policy with career planners, and submit a description of how Supportive Services will be better documented. This should include procedures and forms that will ensure Supportive Services are sufficiently accounted for in the future. Once the procedures and form(s) are approved by the Local Program Liaison, the WDB should provide training to appropriate board staff and career planners.
For any active participants, efforts should be made to correct errors listed above, including obtaining or updating forms, and obtaining signatures and dates on forms, as needed. In cases where dates entered in ASSET do not match information contained in the participant file, ASSET should be updated accordingly.

II. POSITIVE PRACTICES

There are two Positive Practices related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-14 Participant Files

POSITIVE PRACTICE 1: Operations Coordinator position and role

Workforce Connections employs a full-time Operations Coordinator, who primarily serves as a Quality Assurance Auditor to review participant files and ASSET records and ensure accuracy. This is reflected in the participant files, which seem to be very well organized.

POSITIVE PRACTICE 2: Income data collection forms, and documented spreadsheet in files.

WWWDB has very strong forms designed to capture appropriate information for eligibility determination. Especially useful are the spreadsheet used to collect and calculate family composition/size and income to determine low-income status; and the Priority of Service determination form.