

WIB OF SWMO PY'18 PROGRAMMATIC MONITORING REPORT RESPONSE

MORAP:

- **Concern #1:** One of the ten files reviewed was in violation of DWD Issuance 08-2018, WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance as the record did not have proper low-income documentation. The Board is unable to obtain acceptable documentation. The total costs associated with this participant is \$10.00.

Required Action: The Board must re-pay the WIOA grant \$10.00 using non-federal funds within 30 days of the date of this report.

- **WIB Response: The WIB will repay the WIOA grant \$10. The WIB staff will also ensure during sub-state monitoring that customers have the appropriate low-income documentation in files.**
- **Concern #2:** This project did not meet DWD's performance expectations for pre-apprenticeships. Out of the ten files reviewed, only two participants successfully completed the on-the-job learning portion and gained employment. DWD recognizes the efforts of the Board to engage individuals with significant barriers to employment; however, DWD is questioning the fit of this pre-apprenticeship project for those individuals.

Required Action: The Board must provide a written corrective statement detailing how performance expectations will be addressed in future MORAP projects within 30 days of the date of this Report.

- **WIB Response: The WIB is implementing an interview process consisting of WIB staff, Program Coordinators, Case Managers, Training Providers, and potential Employers in the recruitment stage for future pre-apprenticeship programs to address issues that cause customers to not complete the PA program successfully in order to more carefully select customers that are an appropriate fit for the program.**
- **Concern #3:** One of ten files reviewed did not adhere to #14 of the Scope of Work (SOW), as the participant did not take the WorkKeys assessment as required.

Required Action: The Board must provide the assessment documentation and/or a written corrective action statement on how this issue will be avoided in all future special projects within 30 days of the date of this report.

- **WIB Response: The customer in question had a medical issue the day of testing and was unable to take the test at that time. In the future, WIB staff will ensure that any**

customer required to take an assessment as part of a special project Scope of Work completes the assessment or is rescheduled as needed.

WIOA Programs:

- Concern #1: One WIOA In-School Youth participant did not meet eligibility requirements. Low- income documentation was not present in the file. The total amount spent on this participant was \$249.00.

Required Action: The Board provided adequate low-income documentation. The Board must provide a written corrective action statement on how the Board will ensure eligibility is documented correctly at enrollment within 30 days of the date of this report.

- **WIB Response: The WIB staff will monitor 100% of potential WIOA Youth customers for eligibility compliance prior to program participation.**
- Concern #2: Nine of the ten youth files reviewed were in violation of DWD Issuance 03-2015, WIOA Youth Program Framework and Design. Every Youth participant must receive a detailed Objective Assessment (OA), and the OA must include an evaluation of basic skills, occupational skills, prior work experiences, employability, interests, aptitudes, supportive service needs, and developmental needs. Once the OA is completed, staff should use the information to complete a detailed Individual Service Strategy (ISS) that addresses all of the Youth's goals and barriers. This was previously identified on the PY 17 Report.

Required Action: DWD is not seeing improvement in local OAs as expected. Therefore, the Board must conduct 100% local monitoring oversight of all newly enrolled Youth participants to ensure each record has a properly completed OA. A written corrective action statement on how the Board will implement this monitoring requirement is due within 30 days of the date of this report.

- **WIB Response: As a result of the PY 17 monitoring report WIB staff directed its subcontractor to move from the paper objective assessment to using the OA in MoJobs. The WIB is requesting Technical Assistance training from DWD QA regarding the MoJobs OA and proper completion. WIB staff provided initial training to the Youth staff after the PY 17 report, however the MoJobs training site was not available to the WIB staff and attempts to train using the production site was used at that time. This only allowed for verbal and visual explanation of how to complete the OA without hands on practice. WIB staff will monitor the OA as part of the pre-enrollment monitoring for 100% of potential youth customers mentioned**

in the response to Concern #1.

- Concern #3: Five of the ten On-the-Job Training (OJT) files reviewed were in violation of DWD Issuance 21-2017, On-the-Job Training Policy and Guidelines, which states "on site monitoring of each participant must occur, at a minimum, mid-training and upon completion. "The local monitoring did not occur on-site, and not all mid and end-point monitorings were completed.

Required Action: The Board must provide a written corrective action statement on how the Board will comply with this requirement in all future OJTs within 30 days of the date of this report.

- **WIB Response: WIB staff trained all Business Service Representatives on the requirement to provide OJT mid and end point monitoring services on-site. WIB management staff are also implementing more oversight of the mid and end point monitoring during the OJT process and a final oversight check will be made prior to paying the final invoice.**

- Concern #4: Four of the ten OJT files reviewed were in violation of DWD Issuance 08-2018, WIOA Adult and Dislocated Worker Programs Eligibility and Documentation Technical Assistance Guidance. Staff failed to document the required Training Eligibility questions prior to the start of training and/or failed to individualize the answers. This was previously identified on the PY 17 Report.

Required Action: The Board must provide a written corrective action statement on how this issue will be avoided in future training enrollments within 30 days of the date of this report.

- **WIB Response: WIB management staff will add the training justifications to the OJT file check that is performed prior to signature approval for the OJT contract.**

- Concern #5: The LWDB's Local Plan states that its Youth Standing Committee will meet regularly, but it was determined that the Committee was not meeting as stated. The Board acknowledged this and stated that the 'current youth committee will be disbanded" and that the Board will assume the responsibilities.

Required Action: The Board must provide a revised Local Plan and/or a written corrective action statement that describes in detail how this issue will be resolved within 30 days of the date of this report.

- **WIB Response:** The WIB Executive Director will modify the local plan to stipulate that the Board is assuming the responsibilities of the Youth Standing Committee at the September 2019 board meeting. The WIB Operations Manager will provide training at the board meeting regarding the responsibilities to the Board members. The WIB Operations Manager will assist the Board Chair in monitoring the progress of meeting these responsibilities.