



**NEMO WORKFORCE DEVELOPMENT BOARD**

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**PROGRAMMATIC MONITORING REVIEW  
PROGRAM YEAR 2019**

**BOONSLICK REGIONAL PLANNING  
COMMISSION**

**CONDUCTED BY**

**NORTHEAST REGION WORKFORCE DEVELOPMENT BOARD**

Date: April 3, 2020

## SUMMARY

The Northeast Missouri Workforce Development Board (NEMO WDB) staff conducted a Programmatic Monitoring Review (PMR) of its sub-recipients, Gamm, Inc. and Boonslick Regional Planning Commission (BRPC), in fulfillment of the Office of Workforce Development (OWD) Issuance 12-2019 Statewide Sub-State Monitoring Policy, to provide annual monitoring reviews of its sub-recipients. The purpose of the review was to evaluate the management and administration of the workforce programs implemented by the sub-recipients, for the quality of services and the performance of the programs in order to determine if the NEMO WDB's sub-recipients are operating in compliance with current agreements and in a manner that will ensure achievement of program goals and outcomes.

Although no material issues were identified other than those contained in this Report, it does not assure that other problems do not exist. Due to the limited scope of the review, all program deficiencies may not be disclosed. The opinions expressed in this Report are based on the areas reviewed by NEMO WDB staff. The Office of Workforce Development Quality Assurance Team (OWD QA), the United States Department of Labor, the Missouri State Auditor's Office, or any other applicable federal or State body may conduct reviews, and have different conclusions or opinions.

## REVIEW SCOPE

The review focused on desktop and/or full file results; gaining clarification; alerting local staff to problems and resolving as many issues as possible.

Monitor: Sharon Hillard, NEMO WDB Operations/Program Coordinator

Time Period of Records Review: April 30, 2019 to September 30, 2019

## SUB-RECIPIENT: Boonslick Regional Planning Commission

### PROGRAMMATIC MONITORING REVIEW (PMR) RESULTS

NEMO WDB rates issues discovered during PMRs at three levels of severity.

**Findings** - Findings are items that disclose significant deficiencies, material weaknesses in internal controls, material non-compliance, or other significant actions that compromise program integrity. Findings require written corrective action plans by either accepting NEMO WDB's recommendation or proposing and receiving approval for an alternate course of action. Sanctions may be imposed for failure to take timely corrective action. In certain circumstances, Findings may require more serious or immediate action.

The monitor identified no Findings during the review.

**Concerns** - Concerns are items that are a violation of a specific requirement mandated by the WIOA and/or federal and State regulations and DWD issuances. Concerns require written corrective action plans by either accepting NEMO WDB's recommendation or proposing and receiving approval for an alternate procedure.

The monitor identified no Concerns during the review.

**Comments** - Comments are items DWD and/or NEMO WDB has suggested to improve service delivery and/or efficiency and do not generally require a response unless specifically required by NEMO WDB. Resolved Comments and accompanying corrective actions may be included in this category.

## **Classroom Occupational Training (COT) Adult and Dislocated Worker**

**Staff identified eight comments as listed below.**

**Comment #1:** Seven of the 10 records reviewed did not adhere to DWD Issuance 18-2017 Statewide Individual Employment Plan Development Policy (EP). The records contained the following errors: No justification for the appropriateness of goals, no regional LMI information for training goal, short term and long term goals the same, EP not updated as goals and objectives are met or revised and no objectives for goals posted.

**Required Action:** All staff will be required to participate in upcoming EP/ISS training. NEMO WDB had requested training from OWD and they have not delivered the training. NEMO WDB will work with sub-contractor to deliver this training either in person or virtual. BRPC should continue to review the training offered in the LMS system regarding Employment Plans.

**Comment #2:** Five of 10 records reviewed did not adhere to DWD Issuance 08-2017, Change 1, Participant Activity Codes and Definitions. Codes posted contained the following errors: incorrect beginning and ending dates, multiple postings in error, incorrect codes posted and system closed activities.

**Required Action:** Staff error of posting incorrect activity codes and wrong begin and end dates have been case noted, activities have been closed where needed, and Functional Leader has educated staff on proper procedures.

**Comment #3:** Two of the 10 records reviewed did not have a system resume either online and/or active. Individuals cannot match to jobs in the system without a resume.

**Required Action:** Resumes are now online and going forward, staff will ensure all WIOA participants have an active/online resume in the MoJobs system.

**Comment #4:** Six of the 10 records reviewed did not adhere to DWD Issuance 02-2017, Statewide Case Note Policy that requires the following: mandatory initial Case Notes, timely case notes, case notes specific to individual, completed Supportive Service case notes, case notes for customer information updates, and referral outcome updates.

**Required Action:** Case notes have been corrected where possible. Workforce Development Board staff will be providing ongoing training. Issue resolved.

**Comment #5:** Two of the 10 files reviewed did not adhere to DW Issuance 16-2017 Equal Opportunity (EO) Complaint and Grievance Policy requiring a signed copy of the EO Complaint and Grievance Policy in the file for providers.

**Required Action:** Copies of the signed EO Complaint and Grievance Policy forms have now been placed in the files. This issue is resolved.

**Comment #6:** Four of the 10 files reviewed contain issues regarding the participant Objective Assessment (OA) and either had missing or conflicting information.

**Required Action:** Corrections have been made to the Objective Assessments. This issue is resolved.

**Comment #7:** Four of the 10 files reviewed did not contain required documentation for Eligible Training Provider in file.

**Required Action:** Documentation has now been completed and placed in files. Issue resolved.

**Comment #8:** Five of the 10 files reviewed had documents in the participant files that contain missing or incorrect information. In addition, one record had an incorrect total for income (participant was still eligible).

**Required Action:** Information has been placed in participant files and income in the MoJobs Case Management System has been corrected. Issue resolved.

## **Work Experience**

**Staff identified three comments listed as listed below.**

**Comment #1:** One of the two records reviewed did not have the provision of the Work Experience on the Employment Plan as required.

**Required Action:** Going forward, staff will enter this information on the Employment Plan as required. Issue resolved.

**Comment #2:** One of the two records reviewed did not have the first day of employment entered on the I-9.

**Required Action:** The first day of employment has been entered on the I-9. This issue is resolved.

**Comment #3:** One of the two records reviewed did not have the end date entered on the Worksite Agreement Training Plan.

**Required Action:** The end date has been entered on the Worksite Agreement Training Plan. Issue is resolved.

## **Youth Program**

**Staff identified six comments as listed below.**

**Comment #1:** Eight of the 12 records reviewed did not adhere to 18-2017 Statewide Individual Employment Plan (EP)/Individual Service Strategy (ISS) Policy. EP/ISS was not updated, skills gap was not identified, had missing or improper objectives for goals, or did not address all the needs of the participant.

**Required Action:** All staff will be required to attend EP/ISS training. NEMO WDB had requested training from OWD and they have not delivered the training. NEMO WDB will work with sub-contractor to deliver this training either in person or virtual. BRPC should continue to review the training offered in the LMS system regarding Employment Plans.

**Comment #2:** Four of the 12 records reviewed had various issues with posting Activity codes. Activity codes should be posted when the service is actually delivered, and a Case Note should be entered to justify. Additionally, staff must close Activity Codes with the appropriate outcomes.

**Required Action:** Staff error of posting incorrect activity codes and wrong begin and end dates have been case noted, activities have been closed where needed, and Functional Leader has educated staff on proper procedures. Issue is resolved.

**Comment #3:** Three of the 12 records reviewed did not have a system resume completed. Individuals cannot match to jobs in the system without a resume.

**Required Action:** Resumes are now online and going forward, staff will ensure all WIOA participants have an active/online resume in the MoJobs Case Management System. Issue resolved.

**Comment #4:** Nine of the 12 records reviewed has issues regarding the Youth Objective Assessment (OA) regarding missing, incorrect, or conflicting information.

**Required Action:** Ongoing training will be or has been provided by Functional Leader and Workforce Development Board staff. Issue resolved.

**Comment #5:** Six of the 12 records reviewed did not adhere to DWD Issuance 02-2017, Statewide Case Note Policy that requires the following: mandatory initial case notes, timely case notes, case notes specific to individual, completed Supportive Service case notes, case notes for customer information updates, and referral updates.

**Required Action:** Case notes have been entered and corrected. Ongoing training will be or has been provided by Functional Leader and Workforce Development Board staff. Issue resolved.

**Comment #6:** Five of the 12 records reviewed had miscellaneous errors. Including incorrect calculation of income (participant still eligible), Work Experience documents incomplete, and school status not entered in the MoJobs Case Management System.

**Required Action:** Errors have been corrected and issues are resolved.