



NEMO WORKFORCE DEVELOPMENT BOARD

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PROGRAMMATIC MONITORING REVIEW

PROGRAM YEAR 2019

GAMM, INC

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 Monitored: April 30, 2019 to September 30, 2019

Subrecipient: Gamm, Inc.

PROGRAMMATIC MONITORING REVIEW (PMR) RESULTS

Issues discovered during PMRs are rated 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 DWD'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 DWD'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 DWD. Resolved Concerns and accompanying corrective actions may be included in this category.

Classroom Occupational Training (COT) (Adult and Dislocated Worker Programs)

Staff identified seven comments as listed below.

Comment #1: Seventeen of the 73 records reviewed did not adhere to DWD Issuance 18-2017 Statewide Individual Employment Plan Policy (EP) and the EP either had no justification for the goal, improper objectives for the goal, no local LMI information for the goal, or the EP was not updated.

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. Gamm, Inc. should continue to review the training offered in the LMS system regarding Employment Plans.

Comment #2: Seven of the 73 records reviewed did not have a system resume which is a required element.

Required Action: Resumes are now online/active. Going forward, staff will assist all WIOA participants in completing a resume and ensure that they are online/active. This issue is resolved.

Comment #3: Nine of the 73 records reviewed did not adhere to DWD Issuance 02-2017, Statewide Case Note Policy. Case Notes were either missing, incomplete, late, or a template was used and the note was not specific to the individual.

Required Action: Records have been updated and the issues were resolved. Workforce Development Board staff will be providing ongoing training.

Comment #4: One of the 73 records reviewed did not contain a signed copy of the EO Complaint and Grievance Policy form in the record.

Required Action: Equal Opportunity Complaint and Grievance Policy forms have now been placed in file. Issue resolved.

Comment #5: Two of the 73 records reviewed did not adhere to DWD Issuance 04-2018 Participant Activity Codes, Durations, and Definitions. Activity codes were either not posted to the record for service provided or the activity code was posted and the activity was not provided.

Required Action: This has been an ongoing issue and training will be required. Issue resolved.

Comment #6: Two of the 73 records reviewed did not adhere to DWD Issuance 09-2016 Implementation of the Nondiscrimination Equal Opportunity Provisions of WIOA. Records contained confidential information regarding the participant.

Required Action: Confidential information has been removed and issue is resolved.

Comment #7: Two of the 73 records reviewed had various issues with incorrect ONet code and did not contain required Eligible Training Provider System (ETPS) information.

Required Action: ONet code has been corrected. Issue resolved.

Apprenticeship

Staff identified no comments on the one file that was reviewed.

Youth Program

Staff identified seven comments listed below.

Comment #1: Twenty-one of the 52 records reviewed did not adhere to 18-2017 Statewide Individual Employment Plan (EP/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 training. NEMO WDB had requested training from OWD and they have not been able to deliver the training due to the transition to DHEWD and the COVID-19. NEMO WDB will work with sub-contractor to deliver this training either in person or virtual. Gamm, Inc. should continue to review the training offered in the LMS system regarding Employment Plans.

Comment #2: Twelve of the 52 records reviewed had various issues with posting of Activity codes. Activity codes should be posted when the service is actually delivered. Additionally, staff must close Activity Codes with the appropriate outcomes.

Required Action: Training will be required as this has been an ongoing issue.

Comment #3: Three of the 52 records reviewed did not have a system resume completed.

Required Action: Resumes are now completed and online. Going forward, staff will assist all WIOA participants in completing a resume. This issue is resolved.

Comment #4: Nine of the 52 records reviewed did not adhere to DWD Issuance 02-2017, Statewide Case Note Policy. Case Notes were either missing, incomplete, late, or a template was used and the note was not specific to the individual.

Required Action: Training will be required as this has been an ongoing issue.

Comment #5: One of the 52 records did not adhere to DWD Issuance 02-2019 MO Job Center WIOA Services Delivery and Referrals Policy and did not have a case note regarding follow up as to the results of the referral.

Required Action: Case note has been entered regarding the result of the referral. This issue is resolved.

Comment #6: Four of the 52 records reviewed had miscellaneous issues regarding no follow up, and/or incorrect or missing information in the Objective Assessment.

Required Action: Issues resolved.

Comment #7: One of the 52 records reviewed had an issue of disallowed cost. Individual was paid for participation in the Scholars at Work Program and individual was not eligible.

Required Action: Issue resolved. Subcontractor has reimbursed the WIOA Youth Program with non-WIOA funds as required.