 

**NEMO WORKFORCE DEVELOPMENT BOARD**

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# YOUTH

# PROGRAMMATIC MONITORING REVIEW

# PROGRAM YEAR 2021

# BOONSLICK REGIONAL PLANNING COMMISSION

# CONDUCTED BY

**NORTHEAST REGION**

**WORKFORCE DEVELOPMENT BOARD**

**Date: March 15, 2022**

## 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 11-2021 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: March 15, 2021 to March 15, 2022

**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 OWD 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 OWD 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.

## YOUTH PROGRAM

**Staff identified five comments as listed below in the 11 records reviewed.**

**Comment #1:** Seven of the records reviewed did not adhere to OWD Issuance 09-2020 Statewide Individual Employment Plan (EP)/Individual Service Strategy (ISS) Policy. Skills gap not identified, missing goals, plans for the provision of incentives not addressed, no LMI for employment goal, all participant needs not addressed and all required information not provided.

**Required Action:** EP/ISS errors were also noted in the PY20 monitoring and have decreased slightly from 10 errors in 14 records (72%) to 7 errors in 11 records (64%). The NEMO WBD hosts weekly staff meetings where staff is informed of monitoring issues and correct procedures. The NEMO WDB will continue to work with the sub-contractor to improve the development of the Individual Employment Plans. Additional training required due to monitoring results and was provided April 7, 2022. See attachment.

**Comment #2:** The records reviewed had six issues with the posting of Activity codes and did not adhere to OWD Issuance 04-2018, Participant Activity Codes and Definitions. Errors included activity posted with wrong begin and or end date, service provided but activity was not posted and activity posted in error (for payment of WE).

**Required Action:** When compared to PY20 monitoring, Activity Code errors have increased from 6 in 14 records (43%) to 6 in 11 records (55%). The NEMO WDB hosts weekly staff meetings where staff has been informed that Activity Codes should be posted when the service is delivered and should reflect the date the service is provided and the date the service ends. Additionally, staff must ensure the Activity Code is closed when completed with the correct outcome and service provided should meet the definition of the activity code posted. Improvements have been noted in the later records monitored. Additional training required due to monitoring results and was provided April 7, 2022. See attachment.

**Comment #3:** The records reviewed had two errors regarding the Youth Objective Assessment (OA). Records did not adhere to OWD Issuance 13-2019, WIOA Youth Program Framework and Design Policy. Errors included: No assessment of developmental needs and aptitude.

**Required Action:** This issue decreased since the PY20 monitoring from 11 in 14 records (79%) to 2 in 11 records (18%)**.** Errors were discussed with staff to ensure their understanding of assessment requirements. Issue has been resolved.

**Comment #4:** The records reviewed had two errors regarding the provision of Equal Opportunity and Complaint Notice. Records did not adhere to OWD Issuance 16-2017, Disseminating Notices for Equal Opportunity Complaints and WIOA Complaints & Grievances. The records contained the following errors: Wrong Complaint and Grievance form used and provision of Complaint Notice not case noted.

**Required Action:** Issue had been discussed with staff. Case notes have been entered and correct forms will be used going forward. Issue is resolved.

**Comment #6:** The records reviewed had seven errors regarding information entered into the MoJobs Case Management System. The records included: Closure tab not completed, incorrect income entered, wrong Onet code, DOB incorrect, MSG posted incorrectly, job referral not resulted and self-attestation unsigned.

**Required Action:** Errors were discussed with staff and corrected where possible. Issue resolved.

**Comment #6:** The records reviewed had nine miscellaneous errors. Errors included: missing case note addressing employer concerns regarding work experience, the provision of incentives not offered to some participants, resume incomplete and wrong or incomplete information in case note.

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

**Overall Comments:**

The NEMO WDB holds weekly staff meeting where several issues are discussed including monitoring errors and OWD and NEMO WDB Policies are reviewed. Most staff also attend the weekly OWD Wise Up trainings. As a result, the later files reviewed have shown improvement. Files will continue to be monitored for errors and on-going training will be provided where needed.