



NEMO WORKFORCE DEVELOPMENT BOARD

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**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

Sample Size: The Northeast WDB has two sub-recipients (Gamm, Inc. and Boonslick Regional Planning Commission). The sample size was calculated based upon the total individuals served within the time frame monitored for both sub-recipients which was 141 records for Adult and Dislocated Worker. The sample size reviewed for Adult and Dislocated Worker was 105 records. The number of Youth individuals served within the time frame monitored for both sub-recipients was 71. The sample size reviewed was 70 records.

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.

Classroom Occupational Training (COT) Adult and Dislocated Worker

Staff identified 6 comments listed below in the 18 records reviewed.

Comment #1: Nine of the records reviewed did not adhere to OWD Issuance 09-2020 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, and plan not updated.

Required Action: EP issues were also noted in the PY20 monitoring and increased from 7 in 24 records (21%) to 9 in 18 records (50%). Errors have been corrected where possible. The NEMO WDB 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 was required due to the monitoring results and was provided April 7, 2022. See attachment.

Comment #2: Five of the records reviewed did not adhere to OWD Issuance 04-2018, Participant Activity Codes and Definitions. The records contained the following errors: incorrect beginning and ending dates, no provider, activity system closed with no outcome and activity posted but service not provided.

Required Action: Activity Code issues were also noted in the PY20 monitoring and the percent of errors has increased from 6 in 34 records (18%) to 5 in 18 records (28%). Errors have been corrected where possible. 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 a provider is listed for each activity. The NEMO WDB will continue to work with staff to reduce the number of Activity Code errors. Additional training was required due to the monitoring results and was provided April 7, 2022. See attachment.

Comment #3: Twelve of the records reviewed did not adhere to OWD Issuance 02-2021, Statewide Case Note Policy. The records contained the following errors: Late case notes, missing or incomplete case notes for customer information updates including posting/closure of activities and payment of activities and errors in case notes for justification of training.

Required Action: Case note errors were also noted in the PY20 monitoring and the percent of errors increased from 17 in 34 records (50%) to 12 in 18 records (67%). Staff was reminded of the importance of complete and timely case notes and case notes have been corrected where possible. Additional training was required due to the monitoring results and was provided April 7, 2022. See attachment.

Comment #4: Eight of the records reviewed did not adhere to OWD Issuance 16-2017, Disseminating Notices for Equal Opportunity Complaints and WIOA Complaints and Grievances. The records contained the following errors: Wrong Complaint and Grievance form used, Complaint and Grievance forms incomplete and Complaint and Grievance form not completed for training provider.

Required Action: This was not an issue on the PY20 monitoring. Staff has been informed of the importance of using the most current form, completing all the required information on the form and completing forms for all training providers. Issue is resolved.

Comment #5: Nine of the records reviewed had errors regarding the posting of Measurable Skills Gains (MSG), credential postings and verification of barriers. Some of the errors included wrong dates entered for MSG and credential attainment and incorrect or missing documentation for verification of elements/barriers.

Required Action: This was not an issue on the PY20 monitoring. Errors have been corrected where possible. Staff has been informed of the importance of entering correct information into MoJobs and obtaining correct documentation for verification of elements/barriers. Issues were reviewed during a NEMO WDB weekly staff meeting and TEGL 23-19 Attachment II Source Documentation for WIOA Core/Non-core Programs was also reviewed. Issues resolved.

Comment #6: Five of the records reviewed had miscellaneous errors. The errors included incomplete assessment, resume offline, wrong Onet code for training and follow up not completed.

Required Action: Errors have been corrected where possible and issue is resolved.

Career Services

Staff identified 3 comments listed below in the 2 records reviewed.

Comment #1: One of the records reviewed did not have a countable service posted.

Comment #2: One of the records reviewed did not have the WIOA referral resulted.

Comment #3: One of the records reviewed had missing verification documents.

Required Action: Records were corrected where possible and staff was informed of correct procedures going forward. Issues resolved.

Pre-Vocational Services

Staff identified the comments listed below in the four records reviewed.

Comment #1: The 4 records reviewed contained 8 miscellaneous errors. Errors included: Resume expired, no case note explaining why not using SNAP funding, wrong name in record, LMI for wrong region used, no Complaint Notice for training provider, EP not updated and no documentation for payment of training in file.

Required Action: Staff was counselled regarding correct procedures and errors were corrected where possible. Issues are resolved.

Supportive Services

Staff identified 2 comments as listed below in the 18 records reviewed.

Comment #1: Records did not adhere to NEMO WDB Supportive Service Policy 13-2017, Change 1-1. Two of the records reviewed had no supportive service needs assessment in file.

Comment #2: One of the records reviewed had incorrect begin date posted for supportive service activity.

Required Action: Errors have been corrected where possible and staff has been informed of correct procedures. Issues resolved.

Wagner Peyser

Staff identified 3 comments as listed below in the 20 records reviewed.

Comment #1: Four of the records reviewed were referred to WIOA but referral activity was not posted.

Comment #2: Two of the records reviewed had no resume.

Comment #3: One of the records reviewed had incorrect school status entered.

Required Action: Staff was informed of correct procedures. Errors were corrected where possible and all issues were resolved.

Youth Program

Staff identified six 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 WDB 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 was required due to the 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 was required due to the 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 #5: 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.

Data Element Validation

This review is to verify that the performance data elements reported by Missouri are valid, accurate, reliable and comparable across programs. The review is to identify anomalies in the data or missing data, to resolve issues that may cause inaccurate reporting, and to improve program performance accountability through the results of data validation efforts. Data Element Validation has been conducted quarterly. Issues found included missing documentation for element validation, incorrect dates entered for begin and end dates of activities, activities not posted and wrong dates entered for attainment of credential or measurable skills gains.

Comments have been reviewed with staff and corrections were made where possible. The NEMO WDB continues to counsel staff on the importance of correct data validation.

Change Requests

The Northeast Region had 43 Change Requests for July 1, 2021 to 6/13/2022. Boonslick Regional Planning Commission submitted 19. Below is the number of Change Request submit by Case Manager.

- Cindy Schwada – 10
- Julie Prouhet – 4
- Deborah Havercamp – 2
- Dorothy Jones – 3

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.