



NEMO WORKFORCE DEVELOPMENT BOARD

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PROGRAMMATIC MONITORING REVIEW

PROGRAM YEAR 2021

GAMM, INC

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 Monitored: March 15, 2021 to March 15, 2022

Sub-recipient: 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 the NEMO WDBs 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 the NEMO WDBs 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 the NEMO WDB has suggested to improve service delivery and/or efficiency and do not generally require a response unless specifically required by the WDB. Resolved Concerns and accompanying corrective actions may be included in this category.

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

Staff identified five comments as listed below in the 73 records that were reviewed.

Comment #1: Eleven of the 73 records reviewed did not adhere to OWD Issuance 09-2020 Statewide Individual Employment Plan Development Policy (EP). The records contained the following errors: Employment Plan not updated, skills gap not clearly identified, objective closed in error, and barriers not addressed.

Required Action: EP issues were also noted in the PY20 monitoring and increased from 7% to 15%. 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 required due to monitoring results and was provided to all staff April 7, 2022. See attachment.

Comment #2: Five of the 73 records reviewed did not adhere to OWD Issuance 04-2018, Participant Activity Codes and Definitions. Codes posted contained the following errors: activity completed but not closed, no provider listed (and not case noted) and activity system closed.

Required Action: Activity Code issues were also noted in the PY20 monitoring and the percent of errors remains the same at 7%. 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 required due to monitoring results and was provided to all staff April 7, 2022. See attachment.

Comment #3: Five of the 93 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. This was also an issue in PY19 and PY20 monitoring. When compared to PY20 monitoring, the percent of errors has decreased significantly from 9% to 5%. Staff has been reminded of the importance of resumes being online and the number of errors has decreased in the later files reviewed. The NEMO WDB will continue to monitor for compliance. Issue resolved.

Comment #4: Five of the 93 files monitored did not adhere to OWD Issuance 02-2021 Statewide Case Note Policy. Case note errors included missing, incomplete and late case notes.

Required Action: This was not an issue on the PY20 monitoring. Staff was reminded of the importance of complete and timely case notes and files will continued to be monitored for compliance. Additional training was provided to all staff April 7, 2022. See attachment. Issue resolved.

Comment #5: Fifteen of the 93 records reviewed had miscellaneous errors. Some of the errors included posting of outcomes, incorrect or confidential data entered and wrong training information in file. Miscellaneous errors have increased since the PY20 monitoring from 9% to 16%.

Required Action: Errors have been corrected where possible and staff has been informed of correct procedures. The NEMO WDB holds weekly staff meetings where monitoring issues are discussed and OWD Issuances are reviewed. Staff will continue to monitor for improvement. Issue resolved.

Career Services

Staff identified 4 comments in the 5 records reviewed.

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

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

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

Comment #4: One of the records reviewed had BSD barrier question unanswered.

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

Pre-Vocational Services

Staff identified one comment listed below in the one record reviewed.

Comment #1: Resume was expired.

Required Action: This was an issue in the PY20 monitoring and has decreased significantly. Resume was activated. Issue is resolved.

Supportive Services-Adult & DW

Staff identified three comments as listed below.

Comment #1: In 1 of the 93 records reviewed a supportive service activity was provided but the activity was not posted.

Comment #2: In 1 of the 93 records reviewed a Supportive Service Activity Code was posted but the supportive service was not provided.

Comment #3: In 1 of the 93 records reviewed the supportive service eligibility was not updated.

Required Action: Errors have been corrected where possible and staff has been informed of correct procedures. This is the same percentage of errors as last PY and staff will continue to monitor for improvements. Issue resolved.

Work Experience

Staff identified no comments for the one record reviewed.

Wagner Peyser

Staff identified the four comments listed below in the 45 records that were reviewed.

Comment #1: Six of the 45 records monitored had no referral posted for WIOA.

Comment #2: Two of the 45 records monitored had no activity posted to trigger WP participation.

Comment #3: One of the 45 records monitored had no resume online or active.

Comment #4: One of the 45 records monitored had no O*Net listed for desired occupation.

Required Action: Staff was informed of correct procedures. All errors were corrected where possible and

issues were resolved.

On the Job Training (OJT)

Staff identified no issues on the two records reviewed.

Youth Program

Staff identified six comments in the 59 records reviewed.

Comment #1: Records reviewed did not adhere to DWD Issuance 18-2017 Statewide Individual Employment Plan Development Policy (EP). Records reviewed had the following errors: EP/ISS not updated, skills gap not clearly identified, barriers not addressed, no goal for employment, no LMI for employment goal and incentives not addressed on ISS.

Required Action: EP/ISS errors has been an ongoing issue and has increased from PY20 from 5 errors in 60 records (8%) to 15 errors in 59 records (26%). Case managers have been informed of correct procedures and reviewed the training provided through the LMS system. The NEMO WDB hosts weekly staff meetings where staff is informed of monitoring issues and correct procedures. Improvements have been noted in the later records reviewed. The NEMO WDB will continue to work with the sub-contractor to improve the development of the ISS/EP. Additional training required due to monitoring results and was provided April 7, 2022. See attachment.

Comment #2: Records reviewed did not adhere to OWD Issuance 02-2021 Statewide Case Note Policy. Case note errors included missing, incomplete or incorrect information and late notes.

Required Action: The 59 records reviewed contained 18 errors. This is an increase from PY20 monitoring from 5 errors in 60 records (8%) to 18 errors in 59 records (31%). Case managers have been informed of the importance of entering correct and timely case notes and improvements have been noted in the later records monitored. The NEMO WDB will continue to work with the sub-contractor to decrease the number of errors found. Additional training required due to monitoring results and was provided April 7, 2022. See attachment.

Comment #3: Files did not adhere to OWD Issuance 04-2018, Participant Activity Codes and Definitions. Records reviewed had the following errors: Activity not closed when completed, activity provided but not posted, activity posted with wrong begin and/or end dates, activity closed with incorrect outcome.

Required Action: When compared to PY20 monitoring, Activity Code errors have increased from 5 errors in 60 records (8%) to 16 errors in 59 records (27%). 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. 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 #4: Work Experience (WE) file documentation errors. Records reviewed had the following errors: I-9 incomplete, WE training plan not updated, work agreement incomplete, general assurances not initialed, wrong rate of pay on timesheet and wrong individual's information in file,

Required Action: This was not an issue in the PY20 monitoring. Eight errors were found in the 59 records (14%) monitored. Records were corrected where possible and staff has been counseled on correct

procedures. Staff will continue to monitor for improvement. Issue resolved.

Comment #5: WIOA application errors. Records reviewed had the following errors: Incorrect income entered, wrong verification entered for income and age, barrier not verified, school status verification not completed and barrier and employment verification not completed.

Required Action: Eleven errors were found in the 59 files monitored (19%). This was not an issue in the PY20 monitoring. Records were corrected where possible and staff has been counseled on correct procedures. Staff will continue to monitor for improvement. Issue resolved.

Comment #6: The 59 records reviewed had 10 miscellaneous errors. Some of the errors included expired resume, Compliant and Grievance Notice incomplete, WP enrollment not completed, incorrect information entered on the objective assessment, and incentive not paid and incentive paid in error (disallowed cost).

Action taken: Errors have been corrected where possible, disallowed cost was reimbursed with non-WIOA funds and staff has been informed of correct procedures. The NEMO WDB holds weekly staff meetings where monitoring issues are discussed and OWD Issuances are reviewed. Issue resolved.

Supportive Services-Youth

Staff identified two comments as listed below.

Comment #1: No case note to justify supportive service.

Comment #2: Supportive Service paid but activity code not posted.

Required Action: Errors have been corrected where possible and staff has been informed of correct procedures. The NEMO WDB holds weekly staff meetings where monitoring issues are discussed and OWD Issuances are reviewed. Issue 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.

Finding 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.

Overall Comments

Staff continues to struggle with EP/ISS, Activity Codes and Case Notes. Training has occurred throughout the Program Year and later files show much improvement. Overall the issue of resume errors and late case notes has shown much improvement. Many of the issues may be related to staff turnover. The NEMO WDB will continue to monitor for errors and on-going training will be provided where needed.