

Subcontractor Name: Gamm Inc.
Representative: Dana Keller, Executive Director
Monitor: Kerry Savage, Compliance Manager
Reviewed By: Brent Stevens, Executive Director
Signature: Dana Keller
Date: March 14, 2024

I. Executive Summary and Scope of the Equal Opportunity Monitoring

The Workforce Development Board of North Missouri Compliance Manager conducted monitor reviews of Gamm Inc., for Program Year 2023 in compliance with the requirements set forth by *29 CFR (Code of Federal Regulations) Part 38*, State of Missouri Nondiscrimination Plan, Office of Workforce Development (OWD) *Issuance 11-2021 (Sub-State Monitoring Policy)*, and Workforce Development Board of North Missouri policy A23 (*Sub-State Monitoring Policy*).

The WDB conducted a monitoring of Gamm Inc.'s compliance with section 188 of WIOA for the period July 1, 2023, through June 30, 2024, in fulfillment of the requirements of the WIOA, Missouri Nondiscrimination Plan, OWD Issuances, and WDB Policies. This review was conducted to ensure compliance with federal Equal Opportunity laws as outlined within section 188 of the Workforce Innovation and Opportunity Act.

Equal Opportunity monitoring is not an audit and due to the limited scope of the monitoring, may not disclose all systems' weaknesses. The results presented in this report are based on the areas reviewed by WDB staff. The United States Department of Labor, the Missouri Office of Workforce Development, or any other applicable federal or state body may conduct reviews and have different conclusions, opinions, and/or results.

The scope of the programmatic monitoring utilized guidelines established by section 188 of WIOA, the State of Missouri Nondiscrimination Plan, the Office of Workforce Development's (OWD) Sub-state Monitoring Issuance and Workforce Development Board of North Missouri's Sub-State Monitoring Policy.

The Monitoring utilized a self-monitoring worksheet completed by Gamm Inc. as well as on-site visits to the Gamm Incorporated administrative office in LaBelle and the Hannibal Job Center during which the facility and its practices were reviewed for compliance. The Warrenton Job Center was in a temporary location for most of PY23 and the Troy Job Center opened late in the program year; those sites were not included in the monitoring report. The following items were reviewed:

- the "Equal Opportunity is the Law" poster was properly posted;
- a complete accessibility workstation for job center customers is provided;
- Signed acknowledgement from the employees that notification of complaint and grievance rights and procedures was received;
- Employees' signed Confidentiality Agreement
- Notice of availability of translation services and other accommodations is posted;
- Accessibility of the facility;

- The organization's policies relating to non-discrimination, complaint process and accessibility;
- Application for employment;
- Any agreements/contracts with other individuals, organizations;
- the organization's website and social media accounts;
- any items or media promoting services;
- organizational practices relating to the notification of the non-discrimination and filing complaints, collecting of demographic data on applicants for employment and employees;
- Examination of historical change requests;
- Storage of participant, applicant, and employee records;
- Affirmative outreach efforts;
- Determination if prior corrective measures have proven effective;
- Compliance with the requirements set forth in the region's Methods of Understanding, Request for Proposals, and Contract Agreements

II. Results of the Equal Opportunity Monitoring Review

The WDB rates issues discovered during monitoring review at two levels of severity: compliance findings and areas of concern, as defined below. In addition, opportunities have been identified and are also included below.

Compliance Findings - Compliance findings (findings) are items that disclose areas of significant non-compliance with WIOA, federal regulations, the state's nondiscrimination plan, workforce development issuances or guidance, and material weaknesses in internal controls. Findings require written corrective action plans by either accepting the WDB's recommendation or proposing and receiving approval for an alternate course of action. Regulatory compliance monitors will provide citations from WIOA, federal regulations, the state's nondiscrimination plan, or OWD issuances and procedures to identify specific areas of non-compliance and will explain the corrective measures necessary for resolution.

The results of our monitoring disclosed one compliance finding.

Compliance Finding 1:

Notice of the non-discrimination assurance and complaint process to all registrants, applicants, participants, employees, and applicants for employment is required by 29 CFR 38.36. This statute also requires that a signed acknowledgement of receipt of the assurance and complaint process be maintained. Gamm Inc. does not notify applicants for employment how to file a complaint and does not obtain signed acknowledgement of the notice of non-discrimination and complaint procedure.

Corrective Action: This was also noted as a compliance finding on the PY22 annual report, and the responses to the report indicated the application would be revised to ensure compliance in providing the non-discrimination assurance and complaint process moving forward. Submit a written response indicating how the application process has been adapted to ensure that the notice of non-discrimination and complaint process were provided to applicants for employment and a signed acknowledgement of such provision is received and maintained.

Areas of Concern - Areas of concern (concerns) are items that may or may not be compliance-based but may identify practices that could leave the organization vulnerable to a discrimination complaint. Concerns are suggestions to management and do not generally require a response unless specifically indicated. Resolved findings and accompanying corrective actions may be included in this category. Concerns, although resolved, may rise to a level of severity that is subject to follow-up during subsequent review. Regulatory compliance monitors may offer suggestions or guidance to assist the entity in making improvements or may make a referral for further technical assistance.

The results of our monitoring disclosed one Area of Concern.

Area of Concern 1:

The LaBelle office did not have the EO Notice in two languages other than English as required by CFR 29 part 38.9.

Corrective Action: This issue was addressed and the notice is now posted in two languages other than English as required. No further action is necessary.

Opportunities - Opportunities are items the WDB has suggested for revision to indicate to all participants, applicants, and employees the organization has a strong commitment to provide equal access to all programs, services, and employment. These do not require a written response.

During the monitoring, the WDB identified no opportunities for consideration.

Feel welcome to address Brent Stevens with any questions or concerns you may have. Responses, if required, should be submitted to Brent Stevens at bstevens@mail.ncmissouri.edu