

Subcontractor Name: Green Hills Regional Planning Commission
Representative: Lisa Colson, Executive Director
Programs Monitored: WIOA Adult, Dislocated Worker, Youth
Reviewed By: Brent Stevens, Executive Director
Date Issued: 5/28/2024

I. Executive Summary and Scope of the Monitoring

The Workforce Development Board of North Missouri conducted monitor reviews of Green Hills Regional Planning Commission for Program Year 2023 in compliance with the requirements set forth by *20 CFR (Code of Federal Regulations) Part 683.410*, Office of Workforce Development (OWD) *Issuance 11-2021 (Sub-State Monitoring Policy)*, and Workforce Development Board of North Missouri policy A 23 (*Sub-State Monitoring Policy*).

The WDB conducted a programmatic monitoring of the Green Hills Regional Planning Commission's operation of the WIOA Adult, Dislocated Worker, and Youth Programs for the period July 1, 2023, through April 30, 2024, in fulfillment of the requirements of the WIOA, OWD Issuances, and WDB Policies. This review was conducted to ensure the quality of services and the performance of the programs are in compliance with current agreements and in a manner that will ensure achievement of program goals and outcomes.

Programmatic 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 the Office of Workforce Development's (OWD) Sub-state Monitoring Issuance and the Workforce Development Board of North Missouri's Sub-State Monitoring Policy.

The Monitoring utilized a random sample of files that were reviewed remotely. When information located in confidential records was needed, an on-site review was conducted. The following items were reviewed:

- Documentation of participant and training eligibility and/or priority for the programs and services received;
- Orientation to services;
- Signed acknowledgement from the participant that notification of complaint and grievance rights and procedures was received;
- Justification for the provision of Individualized Career Services or Training services;
- Method of assessment;
- Employment planning;
- Individual Training Accounts including all applicable paperwork/documentation;
- Work Based Learning including all applicable paperwork/documentation;

- Appropriateness and accuracy of participant payments (i.e., Supportive Services);
- Appropriate data entry;
- Posting of outcomes, including the attainment of a degree or certificate, measurable skill gains, and any supplemental employment data;
- Examination of historical change requests;
- Compliance issues cited in prior federal, State, and local reviews;
- 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

In addition to the items listed above the following items were reviewed for the Youth Program

- Out-of-School Youth 75% expenditure requirement
- 20% work-based learning with an educational component requirement
- 5% limit on In-School Youth enrolled with "Requires additional assistance" barrier, and
- 5% over-income exception

II. Results of Programmatic Monitoring Review

The WDB rates issues discovered during financial 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, 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, or OWD issuances and procedures to identify specific area of non-compliance and will explain the corrective measures necessary for resolution.

The results of our monitoring disclosed two compliance findings. Requested responses, if applicable, are noted with each finding.

Compliance Finding 1:

Issuance 23-2021 requires file documentation be processed and uploaded immediately to the participant record. Several records were missing documentation related to eligibility, statements related to training payments, paid work experience timesheets, assessments, WIOA applications, or change requests.

Corrective Action: Submit a written plan of action within 90 days of the date of this report outlining the steps to be taken that will ensure staff are uploading all required documentation.

Compliance Finding 2:

Basic Skill Determinations were not done appropriately.

Local policy P-9 requires that all youth participants complete the Basic Skills Assessment Tool at enrollment. During PY24, some youth participants were enrolled without completing the tool and received WIOA funds through paid work experiences.

OWD Issuance 03-2023 outlines documentation required for utilizing BSD for eligibility. Multiple files did not have this barrier properly documented in accordance with state and local policies.

Corrective Action: Submit a written plan of action within 90 days of the date of this report outlining the steps to be taken that will ensure all youth complete the Basic Skills Assessment Tool, and proper documentation uploaded at enrollment as required by state and local policies.

Areas of Concern - Areas of concern (concerns) are items that may or may not be compliance-based but may impede effectiveness and efficiency of providing services to individual and business customers. 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 seven Areas of Concern. The areas of concern may require corrective action.

Area of Concern 1:

WIOA referrals are not posted and/or resulted as required by Issuance 02-2023.

Corrective Action: This was a concern in PY22 but improvement was noted in PY23. Continue to post and result WIOA referrals. *No action needed.*

Area of Concern 2:

Barriers identified on the Objective Assessment (OA) were not addressed within the Individualized Service Strategy (ISS) as required by Issuance 13-2019.

Corrective Action: While there were several files where staff didn't address all barriers noted on the OA within the ISS, some improvement over PY22 was noted in PY23. GHRPC staff is largely new. Training on the Youth program was provided by the WDB on March 14, 2024. Progress toward improvement will be monitored in PY24. *No action needed.*

Area of Concern 3: Issuance 06-2023 requires the posting of activities to participants' records to document services provided. Staff neglected to post the 418 for a participant enrolled in AEL classes, the 425 was missing from several records, and a supportive service payment activity wasn't posted to document a payment.

Corrective Action: This was not indicated as a finding because technical assistance has been provided to address the oversight of posting the 418 and 425 as staff weren't clear on how to document the Scholars at Work program. There was only one instance when the supportive service was not documented with the posting of a related activity. *No correction is required*, but the WDB will continue to monitor for missing activities in PY24.

Area of Concern 4:

Information required of Issuance 09-2022 is missing from the Mandatory Initial Case Note, Funded Services, Work Experience Starting, and Work Experience Payment case notes.

Corrective Action: This was noted as a concern in PY22 and continues to remain a concern in PY23. Additional training and technical assistance was provided by the WDB throughout PY23. References allowing quick access to the information required within case notes have been provided. Please explain, in writing, within 90 days how staff will be certain to include the required information within case notes.

Area of Concern 5:

Elements required by Issuance 09-2020 are missing from the Employment Plan (EP)/ISS. Issuance 09-2020 requires each EP/ISS contain the following elements:

- Short-term goal with an objective
- Customer's current skills making them employable
- Skills gap
- Barriers to employment
- Long-term goal naming a career pathway and providing labor market information including projected growth and salary

Corrective Action: This issue was noted as a concern in PY22 and continues to remain a concern in PY23. The WDB has provided training and technical assistance in PY23. GHRPC staff is largely new and have had little opportunity to implement the training. Progress toward improvement will be monitored in PY24. *No action necessary*.

Area of Concern 6:

Training payment, Corresponding Activity, Work Experience Starting, and Funded Services case notes are missing. Issuance 09-2022 requires a case note for each of these instances.

Corrective Action: This was indicated as a finding in PY22 but has been reduced to a concern in PY23 as progress to improvement was noted. Continued progress toward improvement will be reviewed in PY24. *No action needed*.

Area of Concern 7:

Case notes are posted late. Issuance 09-2022 requires that case notes be posted timely.

Corrective Action: This was identified as a finding in PY22 but improvement was noted in PY23. No action needed.

Opportunities - Opportunities are items the WDB has suggested for revision to strengthen internal controls, improve efficiencies or other processes. These pertain to effectiveness issues and do not require a written response.

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

III. Prior Year Corrective Action Status

All corrective actions in the prior year monitoring were adequately addressed.

IV. Follow Up Requirement

Written responses to address these findings and concerns are to be submitted to the WDB Office to the attention of Brent Stevens at bstevens@mail.ncmissouri.edu.

Any questions regarding this report should be addressed to Brent Stevens.

The signature below acknowledges the receipt of this program monitoring report.

Authorized Representative Signature

Date