

Subcontractor Name: St Joseph Youth Alliance
Representative: Robin Hammond, Executive Director
Programs Monitored: WIOA Adult, Dislocated Worker, and Youth
Reviewed By: Brent Stevens, Executive Director
Issue Date: 5/28/2024

I. Executive Summary and Scope of the Monitoring

The Workforce Development Board of North Missouri conducted monitor reviews of St. Joseph Youth Alliance 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 the Workforce Development Board of North Missouri policy *A23 (Sub-State Monitoring Policy)*.

The WDB conducted a programmatic monitoring of the St Joseph Youth Alliance's operation of the WIOA Adult, Dislocated Worker, and Youth Program 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'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 noncompliance 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.

Compliance Finding 1:

Documents were not included in the online records. Issuance 23-2021 states, "All documents must be processed and uploaded immediately upon receipt of document(s) or a participant receiving a service." Several Adult/DW records were missing eligibility verification documents, the ITA and related statements, and Eligible Training Provider documentation. Youth files were missing PWE timesheets and documentation supporting payment of an incentive.

Corrective Action: Submit a written plan of corrective action to the WDB within 90 days explaining what steps will be taken to ensure documentation is posted to customer records.

Compliance Finding 2:

Required case notes were not created in Adult/DW records. Issuance 09-2022 requires the creation of a Mandatory Initial Case Note and Funded Services notes for training and supportive services, as well as at the start of training and for payment of training services. Issuance 08-2022 requires a Training Eligibility Justification case note be posted prior to the provision of a training service, obligation of payment, or payment. In some cases, the Training Eligibility Case Note was posted after the start of training services, but Issuance 08-2022 explains that training services are not an entitlement of WIOA and must be justified. As the program year went on, improvement was noted in this area, but deficiencies are still present.

Corrective Action: Submit a corrective action plan within 90 days of the date of this report to the WDB detailing how staff will ensure the required case notes will be included in participant records.

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 or may not require corrective action.

Area of Concern 1:

Mandatory Initial, Funded Services, and Start of Training/PWE case notes are missing information required of Issuance 09-2022.

Corrective Action: Submit a corrective action plan within 90 days of the date of this report to the WDB detailing how staff will ensure case notes will contain all required information.

Area of Concern 2:

Case notes do not document staff check-in/follow up. This was noted as a concern in the youth program in PY22; however, improvement was noted. The concern relates to A/DW records.

Corrective Action: Technical assistance was provided on January 16, 2024, by the WDB staff, and a case management worksheet was created to assist staff in tracking customers' progress. Staff progress toward improvement will be monitored during PY24. *No response is required.*

Area of Concern 3:

WIOA Referrals are not posted and/or resulted. Issuance 02-2023 requires that Job Center staff complete a referral to the provider for WIOA Title I services for EO monitoring purposes.

Corrective Action: This was noted as an issue last year as well and some progress toward improvement was noted. Continue efforts to post referrals for each WIOA customer. *No response is required.*

Area of Concern 4:

Case notes were posted late. Issuance 09-2022 requires timely posting of case notes. Youth files demonstrated improvement over PY22; however, Adult/DW files had notes posted over a month late.

Corrective Action: Training and technical assistance was provided to staff on November 3, 2023 and January 16, 2024. Because there has been little opportunity to demonstrate improvement since these trainings, progress toward improvement will continue to be monitored in PY24. *No response is required.*

Area of Concern 5:

Issuance 08-2022 defines the standard of Training Eligibility Justification. Some of these notes do not correctly justify training.

Corrective Action: Training and Technical Assistance has been provided. This area will continue to be monitored in PY24. *No response is required.*

Area of Concern 6:

Activities documenting services provided were not posted to participant records as required by Issuance 06-2023.

Corrective Action: Improvement in this area was noted within youth records. The WDB will continue to monitor for improvement in adult/DW files during PY24. *No response is required.*

Area of Concern 7:

A training payment for SkillUp funded training was made but no case notes or activities had been posted to the SkillUp application. This was an issue only identified once in the course of formal quarterly monitoring but led to a review of SkillUp files by the WDB where many more records with similar issues were found. These cases were individually forwarded to staff for correction and could have led to disallowed costs.

Corrective Action: WDB staff have provided technical assistance as well ongoing guidance and feedback. Improvement has been noted and will continue to be monitored in PY24. *No response is required.*

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. In addition to the area in which improvement has already been noted, quarterly review has seen improvement in the following areas:

1. Barriers indicated on the OA not being addressed within the ISS.
2. Incorrectly dating activities.

Staff have made marked improvement over previous years and should be commended for their efforts.

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