Subcontractor Name: Gamm Incorporated
Representative: Dana Keller, Executive Director
Programs Monitored: WIOA Adult, Dislocated Worker, and Youth
Reviewed By: Darla Shipley, Compliance Coordinator
Issue Date: 5/29/2025

## I. Executive Summary and Scope of the Monitoring

The Workforce Development Board of North Missouri conducted a monitor review of Gamm Incorporated for Program Year 2024 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*).

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 the 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 acknowledgment 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 the Monitoring Review

The WDB rates issues discovered during the programmatic 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.

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Compliance Findings - Compliance findings (findings) are items that disclose areas of significant non-compliance with WIOA, federal regulations, workforce development issuances or guidance. 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 areas of non-compliance and will explain the corrective measures necessary for resolution.

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

**Compliance Finding 1**: Multiple files were found to have missing timesheet documentation

Corrective Action: Gamm Incorporated needs to provide copies of the missing timesheet documentation to the Board for verification. If timesheets cannot be provided, these costs could be considered questioned costs.

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Areas of Concern - Areas of concern (concerns) are items that may or may not be compliance-based but may impede the 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 three Areas of Concern***. The areas of concern may require corrective action.

**Area of Concern 1:** Multiple files were found to have missing or incomplete case notes.

*Scope Item:* OWD Issuance 09-2022 requires case notes to include: correct dates, proper funding documentation, and details regarding service delivery and case management.

*Corrective Action:* Gamm Incorporated needs to continue to internally monitor case notes for compliance. No response is needed for this concern.

**Area of Concern 2:** Multiple employment plans did not meet the requirements of OWD Issuance 09-2020.
*Scope Item:* OWD Issuance 09-2020 requires employment plans to include: skills the participant possesses and a career pathway.

*Corrective Action:* Gamm Incorporated needs to continue to internally monitor employment plans for compliance. No response is needed for this concern.

**Area of Concern 3:** Multiple files were found to have missing or improperly closed activity codes.

*Scope Item:* OWD Issuance 06-2023 requires activity to be entered in order to properly document WIOA services. The Issuance also requires activity codes to be closed properly in order to report accurate dates and outcomes.

*Corrective Action:* Gamm Incorporated needs to continue to internally monitor activity closures for compliance. No response is needed for this concern.

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## III. Follow Up Requirement

Written responses to address these findings and concerns are to be submitted to the WDB Office to the attention of Darla Shipley at dshipley@mail.ncmissouri.edu within 30 days of receiving this report.

Any questions regarding this report should be addressed to Darla Shipley.

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

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Authorized Representative Signature Date