



# OKLAHOMA WORKS

## Oklahoma Office of Workforce Development

### PY15 FINAL MONITORING REPORT Central Oklahoma Workforce Area

**Contracts Reviewed:**

6-553956 (PY14 Youth)  
6-553336 (PY15 Youth)  
6-553506 (FY15 Adult)  
6-553756 (FY15DLW)  
6-553676 (PY15 Adult)  
6-553456 (PY15 DLW)  
6-554256 (FY16 Adult)  
6-554376 (FY16 DLW)  
6-554076 (WINC)

**OOWD Monitors:**

Connie Littleton  
Emmit Grayson  
Sandy Elledge

March 1, 2017

Oklahoma Office of Workforce  
Development  
900 N Portland Avenue  
Oklahoma City, OK 73107  
405-945-3346

## **MONITORING DATES:**

Monitoring: October 3-7, 2016

## **OVERVIEW OF THE LOCAL AREA**

Local Workforce Investment Board–Central Oklahoma Workforce Investment Board  
Fiscal Agent – Central Oklahoma Workforce Investment Board (COWIB)

## **SUMMARY OF REVIEW:**

The Oklahoma Office of Workforce Development (OOWD) conducted a financial and program review of the Central Oklahoma Area's WIOA Title I adult, dislocated worker, and youth programs. The purpose of this review was to assess whether key policies, procedures, and systems are in place to manage these programs. The review covered the period of July 1, 2015-June 30, 2016.

## **REVIEW SCOPE:**

Local Monitoring  
Program and Grant Management Systems  
Financial Management Systems  
Delivery of Adult & DLW Services  
Delivery of Youth Services

## **SECTION 1 – LOCAL MONITORING**

The Central Oklahoma Workforce Investment Area program and financial monitoring was broad and comprehensive and in compliance with their own monitoring policies.

## **SECTION 3 – PROGRAM AND GRANT MANAGEMENT SYSTEMS**

Overall, the Central Oklahoma LWDB demonstrates adequate capacity to perform the broad management functions required to operate federally funded workforce development grants. Prior to and during the on-site financial monitoring, administrative controls, fiscal management policies and procedures, record retention policies and procedures, staffing organization, payroll records, contracting and procurement samples were reviewed.

## **SECTION 4 – FINANCIAL MANAGEMENT SYSTEMS**

The review period for Central Oklahoma Workforce Board monitoring covered July 1, 2015-June 30, 2016 OOWD reviewed all of August 2015, January 2016, and April 2016 expenditures reports for WIOA contracts along with the corresponding budget, accounting records, and cash request. A sampling of board, fiscal agent, and service provider expenditures were selected from the months reviewed. Overall, Central Oklahoma Board demonstrates adequate capacity to perform the fiscal agent financial management functions required to operate federally funded workforce development grants.

## **Best Practice:**

- The fiscal agent is commended for working closely with OOWD financial staff to ensure all grant activity records coincide, and having excellent safeguards and

processes to effectively perform financial management activities of WIOA programs. Examples of notable safeguards and processes include monthly monitoring, as well as the completion of “checks and balances” processes, which occur prior to coding and entering invoices.

## **SECTION 5 – DELIVERY OF ADULT & DLW SERVICES**

OOWD’s comprehensive review of the Adult and Dislocated Worker (DLW) programs consisted of a random monitoring sample which included 6 adult and 2 DLW files.

### **Observations from Review of Files:**

- Adult Client #529085: The case manager is commended for the inclusion of case notes concerning the client’s barriers, which included offender status. Documentation of participation in the Reemerge Program for offenders and the Smart Work Ethics Workshop, and assisting the client in developing an effective schedule to help with the client’s expressed concern about lack of time management skills, is also commended. Case notes did not however, provide sufficient information about attendance at Oklahoma City Community College (OCCC) or about obtained employment.
- Adult Client #853161: The Spring 2016 semester Individual Training Account (ITA) and Coordination of Training Funds (CoTF) referred to in the program notes were not uploaded to OSL.
- Adult Client #1213103: The client’s training program is a great example of a non-traditional training placement (A&P Aircraft Maintenance). This file is also a good example of detailed and extensive program notes, including information about self-sufficiency, which was especially important since the client was employed while attending training.
- Adult Client #496620: In addition to the client’s On-the-Job Training(OJT) agreement, another client’s OJT agreement was uploaded into the file.
- Adult Client #1249955 and Adult Client #779661 were also reviewed with no comments from the monitor.
- DLW Client #1086945: There are no comments from the monitor in reference to PY15 DLW services.
- DLW Client #1224401: Because the client’s IEP is to complete a Bachelor’s Degree which was started prior to program enrollment, a good practice would be to upload a transcript as documentation of credit hours already attained and a degree plan indicating the courses necessary for degree completion.

Although there were no PY15 expenditures in client file #1224401, the initial enrollment and the eligibility determination were made in PY15. The client

enrolled at Southern Nazarene University (SNU) during PY15 for classes beginning in August 2016.

**Areas of Concern:**

- Consistent detail concerning the attainment of unsubsidized employment is necessary for performance outcomes of participants. At a minimum, the name of the employer, the date the entered employment, the job title, hours per week, and hourly or monthly wages need to be included in the virtual case management system for each participant. The detail needed includes whether the unsubsidized employment meets the local board's definition of self-sufficiency within the program notes.
- Supporting documentation must be consistently uploaded into OSL, including Individual Training Account (ITA) contracts, Training Vouchers, Coordination of Training Funds (CoTF) forms, and Individual Employment Plans (IEPs).

**SECTION 6 –DELIVERY OF YOUTH SERVICES**

Target Population: An observation of the Central Oklahoma Workforce Board Cumulative 4-Quarter Reporting Period report indicates the local area made an early commitment to focusing on the WIOA primary target population of out-of-school youth.

Of the total youth who received WIOA services during the monitoring review period, we conducted a comprehensive review on 12 enrollments which included 9 out-of-school youth (OSY), 3 in-school youth (ISY) enrollments.

**Observations from Review of Files:**

- OSY Client 1209332 Observation:  
Please note that Low Income & 1st Generation Post-Secondary Student is not a state defined "Additional Assistance Criteria." However, it was determined by the local area that the client was an out-of-school youth/school dropout. The mother verified that the youth had no GED/ high school diploma.
- OSY Client 1106118:  
There were no observations or findings.
- OSY Client 1103478:  
There were no observations or findings.
- OSY Client 977145:  
There were no observations or findings.
- OSY Client 1763893:  
There were no observations or findings.

- OSY Client 1153163:  
There were no observations or findings.
- OSY Client 794175:  
There were no observations or findings.
- OSY Client 1223197:  
There were no observations or findings.
- OSY Client 1220053:  
There were no observations or findings.
- ISY Client 1208326:  
There were no observations or findings.
- ISY Client 1210533:  
There were no observations or findings.
- ISY Client 1040491:  
There were no observations or findings.

**Youth Policy Review:** The State Policy was issued in 2015 and a change 1 was released in 2016. The local area has policy to move forward without any service gaps to WIOA Youth.

**Best Practice:**

- The local area is commended for being proactive in early 2015 by developing its youth policy and submitting it to the state for review and comment, prior to the release of the state’s youth policy.

**Local Area Response January 19, 2017:**

“In Section 5 and 6 the findings all centered around the lack of documentation being uploaded into Oklahoma Service Link. Certainly we agree with and our policy requires that information to be uploaded and records effectively maintained. In order to address this lack of proper procedural completion, our new service provider, Dynamic Workforce Solutions (DWFS), established training sessions for all career navigators and brought in their corporate quality assurance staff to work on the training. In addition, DWFS supplied additional resources and a complete file review of every participant, Adult, Dislocated Worker and Youth, folder was completed. After the file review, consisting of approximately 800 participants was completed, DWFS furnished us with a complete report. The report identified which files needed additional information to be brought into compliance and that was completed in December by their front-line staff. It also painted a picture of specific areas where training and perhaps monitoring had fell short of expectations. Those have been corrected and both our monitoring efforts will be conducted with a much more vigor

than before. We have also worked with DWFS to shorten the time it takes to complete the participant enrollment process, while maintaining the proper reporting requirements.”

**OOWD has determined the actions described above in response to the Areas of Concern in the Initial Monitoring Report, i.e., the local file review of all Title I participants to determine compliance needs and the additional training for all career navigators, are acceptable resolutions to the Areas of Concern. No further action is required.**

**CONCLUSION:**

Please thank your staff for the hospitality and cooperation provided during the visit conducted by the monitor. We look forward to continuing the excellent working relationship with your office. Our office is available for any technical assistance or support you might need.