



OKLAHOMA WORKS

Oklahoma Office of Workforce Development

PY15 FINAL MONITORING REPORT East Central Workforce Area

Contracts Reviewed:

6-553966 (PY14 Youth)
6-553326 (PY15 Youth)
6-553536 (FY15 Adult)
6-553766 (FY15DLW)
6-553646 (PY15 Adult)
6-553446 (PY15 DLW)
6-554186 (PY15 DLW)
6-554266 (FY16 Adult)
6-554386 (FY16 DLW)
6-554066 (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
405-945-6729

MONITORING DATES:

Monitoring: October 3-7, 2016

OVERVIEW OF THE LOCAL AREA

Local Workforce Investment Board–East Central 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 East Central 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 East Central Workforce Investment Area Youth program and Financial monitoring was broad and comprehensive and in compliance with their own monitoring policies. However, the monitoring for the Adult and Dislocated Worker program was not provided.

Finding:

- Local Workforce Development Boards (LWDBs) and local area sub-recipients/sub-grantees are mandated to conduct monitoring and oversight activities for their programs and activities. [20 CFR Chapter V (4-1-12 Edition) §667.410 (a)]

This issue is considered resolved since the East Central Workforce Investment Board no longer exists. The area was merged into the Central Oklahoma Workforce Development Area (COWIB) effective 07/01/16. The larger local area now has one Board and one service provider. COWIB states they could not locate PY15 Adult and Dislocated Worker monitoring conducted by East Central prior to the merge.

SECTION 3 – PROGRAM AND GRANT MANAGEMENT SYSTEMS

Overall, the East Central 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 East Central/COWIB monitoring covered July 1, 2015-June 30, 2016. OOWD reviewed all of August 2015, January 2016, and April 2016 expenditure reports for WIOA contracts along with the corresponding budget, accounting records, and cash requests. Also, a sampling of board, fiscal agent, and service provider expenditures were selected from the months reviewed. Overall, East Central/COWIB 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 for 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 sample to monitor which included 4 adult and 2 DLW files.

Observations from Review of Files:

- DLW Client #693950: Although program notes indicated where the client went to work and the date employment was entered, employment detail was lacking. There was no wage information, hours per week worked, etc.

There is unemployment documentation in the file, yet there is no indication of the company that laid off the client or the date of the action. This information is required for the DLW section of the monitor’s case file review form.

The ITA was not uploaded into OSL.

- DLW Client #550284: This file did not contain sufficient employment details.

The ITA and training voucher were not uploaded into OSL.

- Adult Client #611079: Program notes indicated that client dropped a class because she went to work full time. There is no documentation of where the client went to work.

The IEP was not uploaded into the system.

- Adult Client #709418: This file did not contain sufficient employment details.

Areas of Concern:

Consistent detail concerning the attainment of unsubsidized employment by participants is necessary for performance outcomes. At a minimum, the name of the employer, date employment was entered, the job title, hours per week, wages and whether the unsubsidized employment meets the local board's definition of self-sufficiency need to be included in the virtual case management system for proper and consistent documentation concerning the attainment of unsubsidized employment.

- Supporting documentation must consistently be uploaded into Oklahoma Service Link (OSL), including Individual Training Account (ITA) contracts, Training Vouchers, Coordination of Training Funds forms, and Individual Employment Plans (IEP).

SECTION 6 –DELIVERY OF YOUTH SERVICES

Target Population: An observation of the East 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 (OSY) youth.

Of the total youth who received WIOA services during the monitoring review period, we conducted a comprehensive review on 7 enrollments which included 7 OSY enrollments.

Observations from Review of Files:

- OSY Client 1233008:
There were no observations or findings.
- OSY Client 1779245:
Attempts at contacting the youth from September 9, 2016 and October 13, 2016 were unsuccessful. Please continue to focus on capturing as many forms of alternate contact information upfront since the population of youth we serve frequently change phone numbers and addresses. Contact through social media accounts prior to an extended gap in communication with a client is one of the messaging portals that we strongly encourage all local areas to implement and consistently practice.
- OSY Client 1769969:
There were no observations or findings.
- OSY Client 1760695:
There were no observations or findings.
- OSY Client 1164493:
There were no observations or findings.

- OSY Client 1106893:
The youth was placed in follow-up, however there was a gap in case notes from November 19, 2015 through March 14, 2016. The March 2016 note indicated there would be follow-up contact with the client in a few weeks, but no other notes exist. What is the follow-up status with the youth?
- OSY Client 1224825:
There were no observations or findings.

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. Several front-line staff members from the East Central Workforce Development Area were transferred to the Central Workforce Development Area when the larger local area was formed. Therefore, all staff transferred from East Central benefited from the training mentioned in the response above. 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.