



**CAREERSOURCE CITRUS LEVY MARION  
Performance and Monitoring Committee**

**MINUTES**

DATE: February 9, 2021  
PLACE: Teleconference Only  
TIME: 9:00 a.m.

**MEMBERS PRESENT**

Brandon Whiteman  
Fred Morgan  
Pat Reddish  
Ted Knight, Chair  
William Burda

**MEMBERS ABSENT**

**OTHER ATTENDEES**

Rusty Skinner, CSCLM  
Dale French, CSCLM  
Cory Weaver, CSCLM  
Cindy LeCouris, CSCLM  
Steven Litzinger, CSCLM  
Andrea Abrams, CSCLM

Cira Schnettler, CSCLM  
Amy Kelly, Underwood Sloan and Assoc.  
Wes Underwood, Underwood Sloan and Assoc.  
Ray Vanderford, TPMA  
Nithya Pramekumar, TPMA

**CALL TO ORDER**

The meeting was called to order by Ted Knight, Chair, at 9:00 a.m.

**ROLL CALL**

Cira Schnettler called roll and a quorum was declared present.

**APPROVAL OF MINUTES**

William Burda made a motion to approve the minutes from the November 3, 2020 meeting. Fred Morgan seconded the motion. Motion carried.

**DISCUSSION ITEMS**

**State Updates**

Rusty Skinner notified the committee that the State is now requiring the local boards to submit local policy for review to align with State policy.

## Workforce Issues that are Important to Our Community

None

## **PUBLIC COMMENT**

None

## **ACTION ITEMS**

### WT/SNAP/WIOA Monitoring Report - Underwood and Sloan

Amy Kelly with Underwood Sloan and Associates reviewed the monitoring report. The report reflected twelve findings, five non-compliance issues, and ten observations across all programs with recommendations for policy creation or updates. The committee thanked Amy Kelly and the monitoring team for a thorough, comprehensive report. William Burda asked about the corrective actions that will be taken based on the findings. Dale French explained that any issues that can be corrected will be corrected and any issues that cannot be corrected will provide an opportunity for training. Dale French also stated that monitoring will continue through this quarter covering other programs and that report will be presented at the next meeting. William Burda made a motion to accept the monitoring report and accept the recommended changes to local policies. Fred Morgan seconded the motion. Motion carried.

## **PROJECT UPDATES**

### Talent Center

Cory Weaver reviewed the quarterly Talent Center report. She noted the annual dip in traffic in December due to CF being closed and the holidays. The majority of appointments are virtual. Both professionals and the students appear to be engaging effectively through the virtual resource.

### Event Report – July – December 2020

Cory Weaver highlighted items from the Event Report, noting hiring events for the Dollar Tree Distribution Center, Amazon, and the World Equestrian Center. The annual Marion Youth Expo was held virtually this year and attendance was the highest it has ever been.

### Workforce Intelligence – December 2020

### Performance Measures – December 2020

### Quarterly Comparison – Centers – Q2 - 2019-2020

Cory Weaver reviewed the reports and welcomed questions from the committee members.

### Experiential Learning Contracts

Cory Weaver summarized each section of the report and noted that there was one OJT that did not end successfully due to attendance issues.

### YouthBuild Reports

Cory Weaver highlighted that of the eleven participants enrolled in the first cohort of the

program, eight completed the program and achieved their high school diploma. The next cohort has started this week.

#### Net Promoter

Steven Litzinger explained that although services took a significant shift from in-person services to virtual services there was not a negative shift in scores from last year. At this time last year the score was 77 and this year was 75, clearly indicating how professionally staff was able to make the transition. He also noted that Business Services will switch from the Sales Force platform to a local platform for surveying businesses. We recently conducted the internal survey of employees and so far the data is reflecting the best scores since conducting the surveys. The full report will be available at the next meeting.

#### Contract Reports

Cindy LeCouris reviewed the performance report for all three counties and the youth report. Levy County met its goals last quarter. Citrus County did not meet one of its goals due to a Covid exposure. Marion County did not meet one of its goals, but has made some follow through in the first quarter so far. All economic partners have the opportunity to earn back any financial holdback by meeting all performance measures by the end of the contract term (June 30, 2021).

#### **MATTERS FROM THE FLOOR**

None

#### **ADJOURNMENT**

There being no further business, the meeting was adjourned at 10:05 a.m.

#### **APPROVED:**

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# PROGRAMMATIC MONITORING

**Underwood Sloan and Associates and  
Indelible Business Solutions**

Preliminary findings of CareerSource Citrus Levy Marion's programmatic processes and procedures for the Workforce Innovation and Opportunity Act and Welfare Transition programs.

Draft  
Report

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## CareerSource Citrus Levy Marion

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## Executive Summary

Underwood, Sloan and Associates, LLC (USA) and Indelible Business Solutions were contracted to conduct programmatic and fiscal monitoring services for CareerSource Citrus Levy Marion (CSCLM). We aim to provide meaningful results through a holistic review of program processes in order to improve CSCLM operations, enhance services to the business community, and ensure quality assistance to those seeking employment and training opportunities.

Based on the contracted scope of work, the initial monitoring contained herein was focused on programmatic activities and program centric financial systems and controls and included interviews with frontline, mid-, and senior level staff. The monitoring included the review of randomly sampled program participant files, payments (training and support services), and payment processes for the Workforce Innovation and Opportunity Act (WIOA) Adult and Youth Programs and the Welfare Transition (WT) Program. The case file review included issuance of supportive services, needs based payments, tuition assistance, and payments made through work-based learning agreements such as On the Job Training (OJT), Customized Training, and Paid Internship and Work Experience agreements.

The review analyzed the validity of all payments as well as a review of CSCLM's processes and controls to ensure compliance with federal and state laws, regulations, and statutes. Finally, the review also provides suggestions for increased efficiencies for the current processes of payment management.

Findings	Twelve Findings
Other Noncompliance Issues	Five Other Noncompliance Issues
Observations	Ten Observations

Overall, the review found that CSCLM's programmatic processes and procedures for these programs conform to applicable state and federal regulations. As the third highest performing Local Workforce Development Board (LWDB) in the State of Florida based on the PY2019-20 Statewide Indicators of Performance report, material findings of noncompliance were minimal. However, many opportunities are present for local office policy creation and/or updates to provide detailed guidance to program staff on many case management functions and processes to establish and reinforce compliance protocol.

## Review Scope

During the October 1, 2020 introductory meeting with CSCLM and USA executive staff, it was determined that a three-day on-site monitoring visit would suffice to kick-off the programmatic review. During the initial visit, conducted October 6-8, 2020 at the Marion County office, staff were interviewed to gain a thorough understanding of the physical handling of the cases for the WIOA and WT programs, including case management, systems processing, and data requirements. Staff provided program policies, forms, and other material to support the internal processes that were explained in detail. At the conclusion of the site-visit, electronic access was granted to the reviewer for the systems necessary to review and test sample participant case files, specifically the Employ Florida, Atlas, One-Stop Service Tracking (OSST), and Gazelle systems.

The remainder of the programmatic review was conducted remotely.

In order to provide a holistic overview of CSCLM processes, not only for compliance with state and federal regulations but also to provide recommendations for efficiencies and improvements, the review included the following:

- A comprehensive evaluation of local office policies for sufficient guidance and compliance.
- A review of prior programmatic monitoring results from the Department of Economic Opportunity (DEO) to identify recurring issues or material findings for process improvement consideration.
- Testing a sample of WIOA Adult and Youth cases utilizing the DEO programmatic monitoring tool.
- Testing a sample of WT cases utilizing the DEO programmatic monitoring tool.
- A review of the sample participant case files for recommendations not included in the DEO programmatic monitoring tools.

All the items reviewed above were evaluated against and/or compared with the following as applicable:

- DEO-LWDB Grantee-Subgrantee Agreement
- DEO Administrative Policies and Final Guidance Papers, Communiques, and Memoranda
- Federal regulations
- State statutes
- US Department of Labor Employment and Training Administration's Training and Employment Notices (TENs) and Training and Employment Guidance Letters (TEGLs)
- The Workforce Innovation and Opportunity Act
- The State Supplemental Nutrition Assistance Program (SNAP) Plan
- The Temporary Assistance for Needy Families (TANF) State Plan



- Florida's TANF Work Verification Plan
- US Department of Labor Employment and Training Administration's findings of noncompliance from other LWDBs

## Overview of the Programs

### Workforce Innovation and Opportunity Act

WIOA is a federal law that authorizes funding for state and local workforce initiatives for eligible adults and youth. WIOA emphasizes the need for access to workforce services for all individuals, which includes adults, dislocated workers, and youth. Target populations include recipients of public assistance, low income individuals, employed workers that need skills upgrading or retraining, and veterans.

WIOA assists businesses not only with finding skilled workers, but with accessing various supports, including education and training for their current workforce, and it assists workers in increasing their long-term employment opportunities and wages through services offered at local career centers.

The goals of WIOA are to:

- Increase the prosperity of workers and employers.
- Reduce welfare dependency, increase economic self-sufficiency, meet employer needs, and enhance productivity and competitiveness.
- Improve services to individuals with disabilities.
- Increase access to employment, education, training and support services – particularly for people with barriers to employment.
- Create a comprehensive, high-quality workforce development system by aligning workforce investment, education, and economic development.
- Improve the quality and labor market relevance of workforce investment, education, and economic development efforts.
- Promote improvement in the structure and delivery of workforce services.

### Welfare Transition Program

In October of 1996, two Acts went into law that dramatically changed the welfare programs in the State of Florida and around the country. The Temporary Assistance for Needy Families

(TANF) legislation changed the nation's welfare system from the receipt of cash assistance as an entitlement to one that requires work in exchange for time-limited assistance.

Also in October of 1996, Florida enacted the Work and Gain Economic Self Sufficiency (WAGES) Act. The Act was developed to implement the requirements of TANF and to emphasize work, self-sufficiency, and personal responsibility, as well as time-limited assistance. In October 2000, the Florida Workforce Innovation Act, Senate Bill 2010, was passed which substantially redefined Florida's welfare delivery system by replacing the former WAGES program with the Welfare Transition Program. The Workforce Innovation and Opportunity Act (WIOA), signed into law on July 22, 2014, is the first legislative reform of the public workforce system in 15 years and created improved access to comprehensive services in the One-Stop delivery system, to include the Welfare Transition Program, throughout the State of Florida and across the entire United States.

The goal of Florida's Welfare Transition (WT) program is to emphasize work, self-sufficiency, and personal responsibility. To accomplish this goal, the Florida legislature, using federal and state funding, has developed an array of support services and programs, to include:

- Specialized case management services.
- Job search assistance.
- Interviewing techniques.
- Individualized skills assessments.
- Employability workshops and life skills training.
- Educational/vocational school assistance.
- Work experience/job leads.
- Monthly travel allowance.
- Referral services

## Overview of Monitoring Results

The outcome of the review is detailed in the following sections of the report identified by the respective program. Outcomes reflect issues noted during the monitoring review and are classified in the report as Findings, Other Noncompliance Issues, and Observations.

Recommendations and suggestions are also made on how to address any identified Findings, Other Noncompliance Issues, and Observations.

- *Findings* – are instances where noncompliance with requirements contained in federal or state laws, rules and regulations, administrative codes, state guidance, or other documents are found and are considered higher risk issues that could impact the integrity of the program operations and/or potentially result in questioned costs.

- *Other Noncompliance Issues* – are general noncompliance conditions considered lower risk findings but could potentially result in higher risk findings based on the nature of the deficiency (i.e. repeat violations, issues indicative of systemic problems in program operations, questioned costs, etc.).
- *Observations* – are informative statements or constructive comments made to identify processes that can help the LWDB improve service delivery and result in positive program outcomes.

## Summary of Findings

### Workforce Innovation and Opportunity Act

1. CLM Policy OPS-46 WIOA Adult and Dislocated Worker Services does not contain guidance on the issuance and storage of reloadable debit cards/instant issue cards or on the method(s) of delivery to participants. \*Substantial issue of note in DOL findings of other LWDB
2. Prior year monitoring's included multiple findings reporting that follow-ups for participants exiting the WIOA program were not recorded timely in Employ Florida by the required quarter after exit. Other follow-up concerns include missing documentation to support that follow-up services were offered.
3. Prior year monitoring's included multiple findings reporting that measurable skill gains were not recorded in Employ Florida for the applicable program year in which the participants were enrolled in an educational or training program.
4. Current monitoring found that a signed Grievance/Complaint and EEO/Discrimination Form was not documented in the case file of one participant.
5. Current monitoring found that one participant in a Custom Business Training program indicated on the Custom Business Training Registration Form that they had served in the military, however the Employ Florida WIOA Application did not indicate such and there was no supporting documentation of veteran status in the participant's case file.
6. Current monitoring found that all youth participants who received supportive services for transportation did not have documentation in the case file to substantiate the amounts for transportation costs that were issued via bus passes or gas cards.  
\*Substantial issue of note in DOL findings of other LWDB

## Welfare Transition Program

1. CLM Policy OPS-81 WTP Support and Incentive Services does not contain guidance on the storage of reloadable debit cards or on the method(s) of delivery to participants.  
\*Substantial issue of note in DOL findings of other LWDB
2. Prior year monitoring's included multiple findings reporting that documentation was missing to support the hours entered on the JPR screen. One of the reviews also found that projected hours were not properly case noted in OSST.
3. Prior year monitoring's included multiple findings reporting that a safety plan was not documented in the case file and that elements from the safety plan were not included in the IRP/ARP.
4. Current monitoring found that one participant was issued a reloadable debit card for reimbursement/payment of past due car payments. There was no documentation uploaded into Atlas to support the amount of payment issued or the receipt of the debit card by the participant.

## Supplemental Nutrition Assistance Program – Employment and Training

1. Prior year monitoring's included multiple findings reporting that documentation was missing to support the hours entered on the JPR screen.
2. Prior year monitoring's found that participants' case files did not contain documentation to support the food stamp reimbursement for transportation costs that were issued.  
\*Related to substantial issue of note in DOL findings of other LWDB

## Summary of Other Noncompliance Issues

### Workforce Innovation and Opportunity Act

1. CLM Policy OPS-26 WIOA Eligibility/Services Information has the priority of service characteristics listed for the WIOA Adult program but does not specify that they must be applied in a specific priority order, instead the policy states that the individual must exhibit at least one of the characteristics listed (Policy, Section III, Adult, 3., page nine).
2. CLM Policy OPS-69 On-the-Job Training does not contain information on the documentation requirements of business reimbursements that are greater than 50%, instead the policy states that "a 75% reimbursement rate will be established when a business enters into an OJT agreement where the OJT trainee is designated as a focus

demographic in regards to WIOA eligibility as follows: Veteran, Individual with a disability, Welfare Transition participant Homeless, Criminal Offender” (Policy, paragraph three, page two).

3. Current monitoring found that when a participant has an active Scholarship Voucher Agreement with support services indicated, a support service/incentive activity is not being entered into the Employ Florida case.
4. Current monitoring found that three participants’ case files were closed with the Verification of Employment supporting documentation found in Atlas, however the employment information was not entered into Employ Florida.

### Welfare Transition Program

1. There is no local office policy guidance on projecting employment hours.

## Summary of Observations

### Workforce Innovation and Opportunity Act

1. There is no local office policy guidance on documenting Measurable Skill Gains, including the different types of Measurable Skill Gains and what documentation is allowable.
2. Current monitoring found on multiple occasions that the supporting documentation for the identified measurable skill gains was uploaded into Atlas much later than when the documentation was obtained and the information added to the Employ Florida case file. In one case, the documentation was not uploaded until the end of the subsequent program year when the case was closed. In another case, the documentation was not uploaded separately under a Cred/Cert category, instead it was found with purchase order documentation.
3. Current monitoring found on multiple occasions that the supporting identification and verification information for the participant was uploaded into Atlas much later than when the documentation was obtained. In one case, the documentation was not uploaded for six months.
4. Current monitoring found on multiple occasions that supporting documentation in the Atlas system did not include verification that the selected area of training and the provider listed on the Scholarship Voucher Agreement were included on the Area Targeted Occupation List for Area 10.

## Welfare Transition Program

1. CLM Policy OPS-51 Earned Months Extension for Individuals Participating in a Substance Abuse or Mental Health Treatment Program is outdated and the guidance no longer applies.
2. CLM Policy OPS-59 Welfare Transition Hardship Extension of Temporary Cash Assistance (TCA) Time Limits includes references and guidance regarding “earned months” that is outdated and no longer applies.
3. CLM Policy OPS-56 Transitional Childcare for Welfare Transition Program Participants includes an incorrect reference to Florida Statute, specifically that “Florida Statutes provide for individuals who are diverted from TCA through Up-Front Diversion to receive TCC for up to one year...” (Procedures and Definitions, bullet ten, page three).
4. CLM Policy OPS-54 Relocation Assistance Program includes duplicative qualifying requirements for relocation assistance, specifically the requirement “there is a basis that supports the assertion that relocation to a new community will contribute to the family’s self sufficiency” is in duplicate of the contributing factors requirement listed directly thereafter (I. Program Guidance, bullets two and three, page two). This policy also includes an incorrect citing of state guidance, “see AWI FG 04-023 for examples of these factors” (I. Program Guidance, bullet three, page two). The correct state guidance is AWI FG 01-023.
5. There is no local office policy guidance on the calculation of the mandatory TANF work participation hours.
6. Local office policy guidance that encompasses multiple programs is difficult to interpret for each program individually.

## Local Office Policy Review

To provide a holistic review of the program’s processes, the monitor evaluated current policies for compliance with federal and state guidance to provide recommendations for improvements and efficiencies.

Local office policies were provided by CSCLM staff for the WIOA, Welfare Transition, and SNAP programs. It was expressed during the review that CSCLM intends to review and update all of the Welfare Transition policies as many of these are outdated.

The review found that the program’s policies provide adequate detail and instruction in accordance with federal and state guidance and offers the following improvement suggestions:

## 1. CLM Policy OPS-46 WIOA Adult and Dislocated Worker Services

### *Finding*

Condition: This policy does not contain guidance on the issuance and storage of reloadable debit cards/instant issue cards or on the method(s) of delivery to participants.

Cause: This policy has not been revised/updated since the new Grantee-Subgrantee Agreement was executed (2020).

Criteria: 29 C.F.R. 95.21(b)(3) states, "Recipients shall adequately safeguard all such assets and assure that they are used solely for authorized purposes." In accordance with 2 C.F.R. 200.302(b)(4), each non-Federal entity must provide for "Effective control over, and accountability for all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes." Further, 2 C.F.R. 200.303(a) states, "The non-Federal entity must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award."

In addition, the updated Grantee-Subgrantee Agreement with DEO stipulates that the subrecipient must certify that written administrative procedures, processes, and fiscal controls are in place for the payment of supportive services including, but not limited to prepaid gas or prepaid debit cards and that controls must address issuance, storage, and reconciliation of prepaid gas or prepaid debit cards. (Substantial issue of note in DOL findings of other LWDB)

Corrective Actions: It is recommended that this policy be updated to include procedures for the issuance and physical storage of reloadable debit cards/instant issue cards as well as the method(s) of delivery to participants in order to strengthen the safeguards of these assets.

## 2. CLM Policy OPS-81 WTP Support and Incentive Services

### *Finding*

Condition: This policy does not contain guidance on the storage of reloadable debit cards or on the method(s) of delivery to participants.

Cause: This policy has not been revised/updated since the new Grantee-Subgrantee Agreement was executed (2020).

Criteria: 29 C.F.R. 95.21(b)(3) states, "Recipients shall adequately safeguard all such assets and assure that they are used solely for authorized purposes." In accordance with 2 C.F.R.

200.302(b)(4), each non-Federal entity must provide for “Effective control over, and accountability for all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes.” Further, 2 C.F.R. 200.303(a) states, “The non-Federal entity must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.”

In addition, the updated Grantee-Subgrantee Agreement with DEO stipulates that the subrecipient must certify that written administrative procedures, processes, and fiscal controls are in place for the payment of supportive services including, but not limited to prepaid gas or prepaid debit cards and that controls must address issuance, storage, and reconciliation of prepaid gas or prepaid debit cards. (Substantial issue of note in DOL findings of other LWDB)

Corrective Actions: It is recommended that this policy be updated to include procedures for the physical storage of reloadable debit cards as well as the method(s) of delivery to participants in order to strengthen the safeguards of these assets.

### 3. CLM Policy OPS-26 WIOA Eligibility/Services Information

#### *Other Noncompliance Issue*

Condition: This policy has the priority of service characteristics listed for the WIOA Adult program but does not specify that they must be applied in a specific priority order, instead the policy states that the individual must exhibit at least one of the characteristics listed (Policy, Section III, Adult, 3., page nine).

Cause: This policy has not been revised/updated since the state guidance was released (2020).

Criteria: [Administrative Policy on Workforce Innovation and Opportunity Act Priority of Service, Policy Number 105](#), states that LWDBs must give priority for the provision of individualized career and training services in the following sequential order: 1) Recipients of public assistance. 2) Low-income individuals. 3) Individuals who are basic skills deficient. The state guidance then goes on to list the specific priority of service to include veterans and asserts that priority of service must be provided to eligible WIOA adult program participants in the following order: 1) Veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, including the underemployed, or individuals who are basic skills deficient. 2) Individuals who are not veterans or eligible spouses who are included in the groups given WIOA priority selection criteria, (public assistance recipient, other low-income individuals including underemployed or basic skills



deficient). 3) All other veterans and eligible spouses. 4) Other individuals who do not meet the statutory priority, but who are identified as priority populations established by the Governor and/or local workforce development boards. 5) Other individuals who do not meet the statutory priority and who do not meet the Governor's or local workforce development board's discretionary priority, but who do meet the WIOA adult program eligibility.

Corrective Actions: It is recommended that this policy be revised to include the appropriate priority of service characteristics in the specific sequential order listed in the state guidance.

#### 4. CLM Policy OPS-69 On-the-Job Training

##### *Other Noncompliance Issue*

Condition: This policy does not contain information on the documentation requirements of business reimbursements that are greater than 50%, instead the policy states that "a 75% reimbursement rate will be established when a business enters into an OJT agreement where the OJT trainee is designated as a focus demographic in regards to WIOA eligibility as follows: Veteran, Individual with a disability, Welfare Transition participant Homeless, Criminal Offender" (Policy, paragraph three, page two).

Cause: This policy has not been revised/updated since the revised state guidance was released (2020).

Criteria: [Administrative Policy on Workforce Innovation and Opportunity Act On-the-Job Training, Policy Number 009](#), as well as [Training and Employment Guidance Letter \(TEGL\) No. 19-16](#), states that LWDBs may increase the wage reimbursement level above 50 percent up to 75 percent for the extraordinary costs of providing the training and additional supervision related to the training; however, factors used when deciding to make the increase must be documented and include the following: a) The characteristics of the participants, taking into consideration whether they are individuals with barriers to employment; b) The size of the employer, with an emphasis on small businesses; c) The quality of employer-provided training and advancement opportunities; and d) Other factors the LWDB may determine appropriate.

Corrective Actions: It is recommended that this policy be updated to include the documentation requirements from state and federal guidance on the determination of wage reimbursement greater than 50%.

## 5. Projecting employment hours

### *Other Noncompliance Issue*

Condition: There is no local office policy guidance on projecting employment hours.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: [Welfare Transition Program Final Guidance on Projecting Employment Hours, FG 072](#), requires that RWBs develop a local operating procedure on projecting employment hours. The local procedure must include the requirement to obtain documentation of employment, proof of a full pay cycle and documentation that the closure alert has been received prior to projecting hours. The procedure should also provide program staff the guidance on how to enter information.

Corrective Actions: It is recommended that a policy be created outlining the process for projecting employment hours or revise the applicable current policies to include this information.

## 6. Measurable Skill Gains

### *Observation*

Condition: There is no local office policy guidance on documenting Measurable Skill Gains, including the different types of Measurable Skill Gains and what documentation is allowable.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: 20 C.F.R. 677.155(a)(v), WIOA Section 116 and TEGL 10-16 Change 1

Federal and state guidance require Measurable Skill Gains (MSG) be recorded in the state's MIS and supported by appropriate case file documentation within the program year. The MSG indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period.

Corrective Actions: It is recommended that a policy be created to provide technical guidance to program staff on the usage and documentation of measurable skill gains as this is a direct indicator of the local performance.

7. CLM Policy OPS-51 Earned Months Extension for Individuals Participating in a Substance Abuse or Mental Health Treatment Program

*Observation*

Condition: This policy is outdated and the guidance no longer applies.

Cause: This policy has not been revised/updated since 2000, prior to the change in statute.

Criteria: In 2005, [Senate Bill 408](#) removed the earned months provisions from Section 414.105, F.S. to align the statute with federal policy on time limitations. [Final Guidance on Medical Incapacity, FG 05-051](#), deletes all reference to substance abuse/mental health treatment earned months as a result of statutory changes by the Florida legislature. In addition, [Guidance Paper on Welfare Transition Hardship Extension to Temporary Cash Assistance \(TCA\) Time Limits, FG 025](#), states that TCA recipients may no longer earn months to extend receipt of cash assistance for the successful completion of substance abuse and mental health treatment programs.

Corrective Actions: It is recommended that this policy be retired as the earned months provisions have been deleted from Florida Statute.

8. CLM Policy OPS-59 Welfare Transition Hardship Extension of Temporary Cash Assistance (TCA) Time Limits

*Observation*

Condition: This policy includes references and guidance regarding “earned months” that is outdated and no longer applies.

Cause: This policy has not been revised/updated since 2003, prior to the change in statute.

Criteria: In 2005, [Senate Bill 408](#) removed the earned months provisions from Section 414.105, F.S. to align the statute with federal policy on time limitations. [Guidance Paper on Welfare Transition Hardship Extension to Temporary Cash Assistance \(TCA\) Time Limits, FG 025](#), states that (1) TCA recipients may no longer earn additional months for working and complying with program requirements and (2) TCA recipients may no longer earn months to extend receipt of cash assistance for the successful completion of substance abuse and mental health treatment programs.

Corrective Actions: It is recommended that this policy be revised and updated to remove all guidance related to earned months as these provisions have been deleted from Florida Statute.

## 9. CLM Policy OPS-56 Transitional Childcare for Welfare Transition Program Participants

### *Observation*

Condition: This policy includes an incorrect reference to Florida Statute, specifically that “Florida Statutes provide for individuals who are diverted from TCA through Up-Front Diversion to receive TCC for up to one year...” (Procedures and Definitions, bullet ten, page three).

Cause: This policy includes guidance to limit Transitional Childcare to one year based on the local directive and incorrectly cites statute.

Criteria: While [Final Guidance on Welfare Transition Transitional Childcare, FG 04-020](#), provides the authority for the RWB to limit the length of time TCC referrals will be provided, Section 445.032, F.S. specifically provides for TCC for up to two years. The one year time limit is based upon local policy, not statute.

Corrective Actions: It is recommended that this policy be revised to correct this statutory reference.

## 10. CLM Policy OPS-54 Relocation Assistance Program

### *Observation*

Condition: This policy includes duplicative qualifying requirements for relocation assistance, specifically the requirement “there is a basis that supports the assertion that relocation to a new community will contribute to the family’s self sufficiency” is in duplicate of the contributing factors requirement listed directly thereafter (I. Program Guidance, bullets two and three, page two). This policy also includes an incorrect citing of state guidance, “see AWI FG 04-023 for examples of these factors” (I. Program Guidance, bullet three, page two). The correct state guidance is AWI FG 01-023.

Cause: State guidance and statute were incorrectly interpreted.

Criteria: [Final Guidance on Welfare Transition Program Relocation Assistance, FG 01-023](#), asserts that once TCA eligibility is determined, either as a current recipient or an applicant that qualifies for Up-Front Diversion, (1) a need for relocation must be demonstrated as well as (2) a contributing factor to achieving self-sufficiency as a result of the relocation. In addition, Section 445.021(2)(b), F.S. lists the same contributing factors as the Final Guidance but under the statement that “A determination that there is a basis for believing that relocation will contribute to the ability of the applicant to achieve self-sufficiency.”

Interpretation of the statute and the guidance indicate that the contributing factors make up the basis to support the assertion that relocation will contribute to self sufficiency and that these are not two separate qualifying requirements.

Corrective Actions: It is recommended that this policy be revised to include the qualifying requirements found in state guidance and statute. Listing out in the policy the specific examples for the needs and contributing factors is also recommended as well as correcting the reference to state guidance.

## 11. Work participation hours calculation

### *Observation*

Condition: There is no local office policy guidance on the calculation of the mandatory TANF work participation hours.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: While CLM OPS-10 Unpaid Community Service/Work Experience documents the process for calculating the participation hours for community service and work experience activities, there is no guidance on the total amount of hours needed per 42 U.S. Code § 607 and state established standards for TANF work activities.

Corrective Actions: It is recommended that a policy be created to provide technical guidance to program staff on the TANF work participation hours requirements with detailed instruction on calculating the required hours by activity (core and supplemental), comparing the calculated amounts to the established minimums based on family type, and denoting where deeming is appropriate.

## 12. Multiple program policies

### *Observation*

Condition: Local office policy guidance that encompasses multiple programs is difficult to interpret for each program individually.

Cause: N/A

Criteria: N/A

Corrective Action: It is recommended that separate policies be developed for each program individually to ensure accurate understanding of each program's requirements.

## Significant Prior Monitoring Findings

To further the holistic review of the program's compliance, the monitor compiled previous programmatic monitoring reports completed by the Department of Economic Opportunity, Division of Workforce Services, Bureau of One-Stop and Program Support. Specifically, the results from Program Years 2016-17, 2017-18, 2018-19 and the preliminary review summary for Program Year 2019-20 were analyzed for recurring findings of noncompliance or for major issues of concern to identify meaningful areas of improvement.

### Workforce Innovation and Opportunity Act

#### 1. Program Follow-ups

##### *Finding*

Condition: Deficiencies were found for multiple years reporting that follow-ups for participants exiting the WIOA program were not recorded timely in Employ Florida by the required quarter after exit. Other follow-up concerns include missing documentation to support that follow-up services were offered.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: WIOA Sec. 116, TEGL 17-05, and the Follow-up Memorandum entitled "Entering Case Follow-ups in Employ Florida Marketplace" dated March 23, 2007

Federal and state guidance require quarterly follow-ups for participants exiting the WIOA program. Participants who exited the WIOA programs with employment were to receive 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> quarter follow-up services based on their exit date. Follow-ups must be conducted with the employer to determine the participant's continued employment status. Quarterly follow-ups also help to determine performance outcomes.

Corrective Actions: Program staff must continue to ensure that follow-ups are conducted at the required intervals and entered timely in the system by the due date indicated in the follow-up table. The "WIOA Exiters for Follow-Up Report" in Employ Florida should continue to be used by program staff. To further assist in this process, case managers can set

appropriate follow-up due dates in Employ Florida to alert and/or remind them of upcoming events and timelines to prevent the required deadlines for follow-ups to expire.

This finding was an issue for Program Years 2016-17 and 2017-18. While subsequent monitorings have not discovered this to be a continuing issue, multiple instances across program years indicate a potential opportunity for process improvements.

## 2. Recording of Measurable Skills Gains

### *Finding*

Condition: Deficiencies were found for multiple years reporting that measurable skill gains were not recorded in Employ Florida for the applicable program year in which the participants were enrolled in an educational or training program.

Cause: There are no written procedures regarding reporting and documentation of Measurable Skill Gains. This finding is linked to Local Office Policy Review item 6 – Measurable Skill Gains.

Criteria: 20 C.F.R. 677.155(a)(v), WIOA Section 116, and TEGL 10-16 Change 1

Federal and state guidance require Measurable Skill Gains (MSG) be recorded in the state's MIS and supported by appropriate case file documentation within the program year. The MSG indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period.

Corrective Actions: Program staff must ensure that MSG attainment information is recorded timely and accurately in Employ Florida to match the MSG documents retained in the participant case files. It is also recommended that local office policy be created or amended to include guidance for program staff on the reporting and documentation requirements for Measurable Skill Gains.

This finding was an issue for Program Years 2018-19 and 2019-20. Multiple instances across program years indicate a potential opportunity for process improvements.

## Welfare Transition Program

### 1. Documentation of Activity Hours Recorded on the Job Participation Rate Screen

#### *Finding*

Condition: Deficiencies were found for multiple years reporting that documentation was missing to support the hours entered on the JPR screen. One of the reviews also found that projected hours were not properly case noted in OSST.

Cause: There are no written procedures regarding reporting and documentation of the hours entered on the JPR screen. This finding is linked to Local Office Policy Review item 5 – Projecting employment hours.

Criteria: 445.010 F.S.; 45 C.F.R. 261.60-62 and 45 C.F.R. 262; and Florida’s Work Verification Plan

Federal Law and state guidance require engagement in work activities and participation hours must be documented and auditable. Program staff must enter hours of participation on the job participation rate (JPR) screen in OSST and this data is then used to report performance (participation rates). Also, when employment hours are being projected, they must be updated to reflect the actual hours documented on the paystubs when they are received to ensure the hours reported to the Department of Children and Families (DCF) are accurate and match documentation retained in participant case files.

Corrective Actions: Although the number of instances is minimal, program staff must continue to ensure documentation or other forms of allowable verification for participation rate hours are retained in the case files. Program staff must thoroughly review each case transaction to ensure hours of participation in countable work activated are documented by the participant and verified by staff prior to entering the hours in OSST. Local quality assurance staff should also closely monitor and follow through on the actions proposed in their prior CAP(s).

It is also recommended that local office policy be created or amended to include guidance for program staff on the documentation requirements for job participation rate hours.

This finding was an issue for Program Years 2017-18 and 2018-19. While subsequent monitorings have not discovered this to be a continuing issue, multiple instances across program years indicate a potential opportunity for process improvements.



## 2. Safety Plan

### *Finding*

Condition: Deficiencies were found for multiple years reporting that a safety plan was not documented in the case file and that elements from the safety plan were not included in the IRP/ARP.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: 45 C.F.R. 261.11-14; 45 C.F.R. 260.50-59; 445.021 F.S.; 445.028 F.S.; 445.030 F.S.; 445.031 F.S.; 445.032 F.S.; and FG 02-026 Domestic Violence Program Final Guidance Paper

Federal regulations and state guidance require LWDBs to complete a safety plan and include the elements of the safety plan on either the Individual Responsibility Plan (IRP) or the Alternative Requirement Plan (ARP) for individuals identified as victims of domestic violence.

Corrective Actions: If a participant has been identified as a victim of domestic violence, program staff must ensure that all requirements for development of a safety plan are met, including the requirement that information from the safety plan be included on the IRP/ARP.

This finding was an issue for Program Years 2018-19 and 2019-20. Multiple instances across program years indicate a potential opportunity for process improvements.

## Supplemental Nutrition Assistance Program – Employment and Training

### 1. Documentation of Activity Hours

### *Finding*

Condition: Deficiencies were found for multiple years reporting that documentation was missing to support the hours entered on the JPR screen. This is also a repeat issue for Welfare Transition.

Cause: There are no written procedures regarding reporting and documentation of the hours entered on the JPR screen.

Criteria: 7 C.F.R. 273.7 (d)(4)(ii), (e)(1), (m) (3) (v) (A), and the State SNAP Plan

Federal law and state guidance require hours spent in an activity be verified, entered on the OSST system's JPR screen, and documented in the participant's case file.

Corrective Actions: Program staff must ensure that they accurately count and verify participation hours before entering the information in OSST, and that timesheets used to support the hours are maintained in the participant's case file. It is also recommended that local office policy be created or amended to include guidance for program staff on the documentation requirements for job participation rate hours.

This finding was an issue for Program Years 2016-17 and 2017-18. While subsequent monitorings have not discovered this to be a continuing issue, multiple instances across program years indicate a potential opportunity for process improvements.

## 2. Food Stamp Reimbursements (FSR)

### *Finding*

Condition: Deficiencies were found reporting that participants' case files did not contain documentation to support the food stamp reimbursement for transportation costs that were issued.

Cause: There are no written procedures regarding the maintenance of the supporting documentation in participants case files.

Criteria: 7 C.F.R. 273.7 (d) (4) (ii) and the State SNAP Plan

Federal law and state guidance require participants engaged in program activities must be reimbursed for expenses that are reasonably necessary and directly relate to participation in the program. Reimbursement for transportation costs are based on the presentation of appropriate documentation.

Corrective Actions: Program staff must ensure documentation is collected to support issuance of a food stamp reimbursement before processing for payment and that appropriate documentation is maintained in the participant's case file. It is also recommended that OPS-80 Supplemental Nutrition Assistance Program (SNAP) be updated to include guidance for program office staff on the documentation retention procedures.

This finding was an issue for Program Year 2016-17. While subsequent monitorings have not discovered this to be a continuing issue, processes related to participant reimbursements were a substantial issue of note in the DOL findings of other LWDB.

### 3. Assignment of Activity Hours

#### *Finding*

Condition: Deficiencies were found for multiple years reporting that participants were assigned less than 80 hours of work activities per month. One of the reviews also found that participants were assigned more than 120 hours for a month.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: 7 C.F.R. 273.7(d)(4)(ii), (e)(1), and (m)(3)(v)(A), (m)(5)(B)(ii); 273.24(a)(3)(ii), and the State SNAP E&T Plan

Federal and state law require Able-Bodied Adults without Dependents (ABAWDs) to meet certain participation requirements. For purposes of meeting these requirements, ABAWDs must participate in one or more qualifying components (i.e. education, job search, job search training, etc.) for 20 hours per week to average 80 hours per month. Additionally, employed participants cannot be assigned to more than 120 hours monthly.

Corrective Actions: Program staff must accurately assign participants to the correct number of hours in program activities and accurately count and verify participation hours before entering the information into OSST.

This finding was an issue for Program Years 2018-19 and 2019-20. Multiple instances across program years indicate a potential opportunity for process improvements.

## Participant Case File Review

The current monitoring included sample testing and review of participant case file records. Electronic access was granted to the monitor for the Employ Florida, One-Stop Service Tracking (OSST), and Atlas systems in order to remotely review the sample cases provided by CSCLM. The files were checked to determine whether adequate documentation was maintained to support participant eligibility and services rendered as well as the validity and accuracy of system records and keyed entries made by program staff against original source documents. Case files were further reviewed for operational efficiencies and improvement opportunities.

DEO's programmatic monitoring review tools were used to conduct the review for each of the workforce programs included in the monitoring. The tools are designed to provide a comprehensive assessment of the processes and procedures used by CSCLM staff to operate and manage programs. Use of the monitoring tools ensured the review process followed a

planned and consistent course of action that provided adequate verification of specific program data elements.

## Workforce Innovation and Opportunity Act – Adult

The WIOA Adult case file review focused on compliance with federal, state, and local guidelines. The review included, but was not limited to:

- A review of program and operational processes to ensure that all case files contained evidence that participants were eligible, enrolled in allowable activities, and any training provided was in demand occupations provided by institutions on the state/local eligible training provider list.
- A review to determine if participants who entered into employment were placed in jobs that offered a self-sufficient wage as defined by local policy, if credential/certification attainment data were accurately recorded in Employ Florida, and if follow-ups were performed at the required intervals.
- If employed workers were participating in skills upgrade or other training/retraining activities, the review checked to see if training was provided in response to the employer's assessment that such training was required for the workers referred.

The sample reviewed consisted of 22 WIOA Adult participant case files. Most participant case files reviewed contained documentation of eligibility and other case management elements, and participant data records in Employ Florida were determined to have been correctly entered based on case file documentation requirements. However, the following issues were identified and are noted as appropriate based on the severity (Finding, Other Non-compliance Issue, or Observation):

### 1. Grievance/Complaint Form

#### *Finding*

Condition: A signed Grievance/Complaint and EEO/Discrimination Form was not documented in the case file of one participant (4.5 percent). There is a staff note that the CareerSource Citrus Levy Marion Services Application forms were received online and they are dated, however there are no signatures present.

Cause: Electronic submission of the CSCLM Services Application forms did not allow for applicant signature.

Criteria: DEO FG 00-004 rev. 06/08/07, 20 C.F.R. 683.600

Federal and state guidance require that each local area must establish and maintain a procedure for participants to file grievances and complaints alleging violations of the requirements of title I of WIOA and must provide information about the content of the grievance and complaint procedures to participants. A signed and dated Grievance/Complaint and EEO/Discrimination Form should be found in every participant's case file.

Corrective Actions: If a participant submits the Release of Information/Attestation form online without the required signature, program staff must ensure that the participant signs the form and that the signed form is uploaded into Atlas.

## 2. Veteran Status

### *Finding*

Condition: One participant (4.5 percent) in a Custom Business Training program indicated on the Custom Business Training Registration Form that they had served in the military, however the Employ Florida WIOA Application did not indicate such and there was no supporting documentation of veteran status in the participant's case file.

Cause: Program staff did not accurately complete the Employ Florida WIOA Application with the participant's veteran status and obtain the required documentation.

Criteria: WIOA Sec. 3(63)(A) and (B), JVA 38 U.S.C. Section 4215 and 101, 20 C.F.R. 1010.110, and Local Workforce Services Plan

Federal and state guidance require recipients of federal funding for qualified job training programs to collect and maintain information on applicants and/or participants that are veterans or eligible spouses of veterans for priority of service. Documentation of veteran status should be found in every veteran's or eligible spouse of a veteran's case file.

Corrective Action: When program staff are given permission by the participant to register their information in Employ Florida, they should make sure to enter the participant's information as reported to ensure accurate data and reporting. Documentation regarding the participant's veteran status should be maintained in the case file.

### 3. Supportive Services Activities

#### *Other Noncompliance Issue*

Condition: When a participant has an active Scholarship Voucher Agreement with support services indicated, a support service/incentive activity is not being entered into the Employ Florida case.

Cause: Current office process does not include the entry of separate support service/incentive activities into Employ Florida when a 300-level activity (Occupational Skills Training) is open.

Criteria: While local office policy and state and federal guidelines/regulations do not require a separate activity, the DEO WIOA monitoring tool specifically asks if a support service/incentive activity was entered in the State MIS, with a No response indicating that the participant did not receive a supportive service (line 80 on the DEO WIOA Adult and Dislocated Worker Review Tool PY 2020-21).

Corrective Actions: It is recommended that local office policy be revised to include guidance on utilizing appropriate support service/incentive activities in Employ Florida in order to ensure transparency and compliance with state monitoring.

### 4. Employment

#### *Other Noncompliance Issue*

Condition: During case file reviews, it was observed on three occasions (13.6%) that participants' case files were closed with the Verification of Employment supporting documentation found in Atlas, however the employment information was not entered into Employ Florida.

Cause: There are no written procedures on recording employment information in Employ Florida.

Criteria: Federal Data Validation Requirements

Corrective Actions: It is recommended that upon closure of cases in Employ Florida for participants with unsubsidized employment, that the employment information be entered into the system for accurate reporting.

## 5. Measurable Skill Gains

### *Observation*

Condition: During case file reviews, it was observed on multiple occasions that the supporting documentation for the identified measurable skill gains was uploaded into Atlas much later than when the documentation was obtained and the information added to the Employ Florida case file. In one case, the documentation was not uploaded until the end of the subsequent program year when the case was closed. In another case, the documentation was not uploaded separately under a Cred/Cert category, instead it was found with purchase order documentation.

Cause: There are no written procedures regarding reporting and documentation of Measurable Skill Gains. This finding is linked to Local Office Policy Review item 6 – Measurable Skill Gains.

Criteria: N/A

Corrective Actions: It is recommended that measurable skill gains documentation be uploaded timely into Atlas as a separate document upon receipt to allow for prompt case reconciliation.

## 6. WIOA Verification Information

### *Observation*

Condition: During case file reviews, it was observed on multiple occasions that the supporting identification and verification information for the participant was uploaded into Atlas much later than when the documentation was obtained. In one case, the documentation was not uploaded for six months.

Cause: The cause of the issue is unknown; management consultation may be necessary to determine.

Criteria: N/A

Corrective Actions: It is recommended that CSCLM implement a specific expectation that all supporting documentation and case files be uploaded timely into Atlas to allow for prompt case reconciliation and to ensure that documentation is available for audit.

## 7. Area Targeted Occupation

### *Observation*

Condition: During case file reviews, it was observed on multiple occasions that supporting documentation in the Atlas system did not include verification that the selected area of training and the provider listed on the Scholarship Voucher Agreement were included on the Area Targeted Occupation List for Area 10.

Cause: There is no written policy on including verification in the case file supporting that the training and provider are included on the Area Targeted Occupation List.

Criteria: N/A

Corrective Actions: It is recommended that verification be included with the Scholarship Voucher Agreement that the training program and the provider selected are listed on the Area Targeted Occupation List for Area 10 for processing efficiencies and documentation consistency.

## Workforce Innovation and Opportunity Act – Youth

The WIOA Youth case file review focused on compliance with federal, state, and local guidelines. The review included, but was not limited to:

- The process for determining and documenting participant eligibility including low-income status, if the youth had at least one of the federal/local barriers, and whether documentation in the participant case files substantiate program participation information recorded in Employ Florida.
- A review of processes and procedures used by CSCLM and the service provider to manage and administer their youth program, including whether youth met the requirements for their respective customer groups and whether an objective assessment was provided of academic and skill levels and the service needs of each participant.
- Whether attainment data on credentials/certifications were recorded accurately in Employ Florida and all that all youth exiting the program received required follow-up services.

The sample reviewed consisted of 11 WIOA Youth participant case files. Participant case files reviewed contained documentation of eligibility and other case management elements, and participant data records in Employ Florida were determined to have been correctly entered based on case file documentation requirements. However, the following finding was identified:



## 1. Supportive Services

### *Finding*

Condition: During case file reviews, it was observed that all participants who received supportive services for transportation did not have documentation in the case file to substantiate the amounts for transportation costs that were issued via bus passes or gas cards.

Cause: There are no written procedures regarding the calculation of the amounts for supportive services transportation needs.

Criteria: 29 C.F.R. 95.21(b)(3) states, "Recipients shall adequately safeguard all such assets and assure that they are used solely for authorized purposes." In accordance with 2 C.F.R. 200.302(b)(4), each non-Federal entity must provide for "Effective control over, and accountability for all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes." Further, 2 C.F.R. 200.303(a) states, "The non-Federal entity must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award."

In addition, the updated Grantee-Subgrantee Agreement with DEO stipulates that the subrecipient must certify that written administrative procedures, processes, and fiscal controls are in place for the payment of supportive services including, but not limited to prepaid gas or prepaid debit cards and that controls must address issuance, storage, and reconciliation of prepaid gas or prepaid debit cards. (Substantial issue of note in DOL findings of other LWDB)

Corrective Actions: It is recommended that policy guidance be created to ensure that supportive service payments are issued to participants in the actual amount of need and that documentation to substantiate the amount be uploaded into the Atlas system or detailed in a case note.

## Welfare Transition Program

The Welfare Transition case file review focused on program processes, operational practices, and MIS data to determine compliance with program requirements. The review included, but was not limited to:

- The initial and any subsequent assessment processes.
- The process for developing the Individual Responsibility Plan (IRP), the IRP tool used locally, and the process for developing and assigning participants to work activities.
- A review of documentation to support hours entered into OSST for participant credit, and to ensure participants are engaged in activities that meet federal requirements and definitions.

The sample reviewed consisted of 22 Welfare Transition participant case files. Participant case files reviewed contained documentation to support all case management elements, and participant data records in OSST were determined to have been correctly entered. However, the following issue was identified:

## 1. Support Services

### *Finding*

Condition: One participant (4.5 percent) was issued a reloadable debit card for reimbursement/payment of past due car payments. There was no documentation uploaded into Atlas to support the amount of payment issued or the receipt of the debit card by the participant.

Cause: There are no written procedures regarding the retention of supporting documentation for reloadable debit cards. This finding is linked to Local Office Policy Review item 2 – CLM Policy OPS-81 WTP Support and Incentive Services.

Criteria: 445.025 F.S., and TANF State Plan 2017-2020

Federal and state guidance provide for support service payments to participants in the form of reimbursement for actual expenditures against receipts or invoices. Documentation should be found in the case file to support the amounts entered in OSST for support service payments and reimbursements.

Corrective Actions: Local Office policies and procedures should be updated to include direction for program staff to upload documentation into the participant's case file to support the amounts entered into OSST for all support services provided and for the issuance of the reloadable debit cards to the participants.

It was noted during the review that CSCLM staff intends to update the referenced policy to include guidance on the uploading of the supporting documentation.