Mission ...
Western Wisconsin WDB is a collaborative, interactive and coordinated network of training resources and support services that is providing and retaining a well-skilled labor force for employers in western Wisconsin.

Vision ...
To provide a comprehensive and integrated and customer-driven and results-oriented system for workforce development that responds to the needs of the employers, job seekers, incumbent workers and youth.

Western Wisconsin Workforce Development Board, Inc.

WDB Full Board

Monday, October 23, 2017
11:00 a.m. to 12:30 p.m.

AmericInn Hotel & Conference Center
La Crosse Room
1835 Rose Street
La Crosse, WI 54603

RSVP your attendance to Jessie
fossj@westernwdb.org

** Please note: a call in line will not be available due to the meeting being held off site. **

Upcoming Meetings

All meetings begin at 3:00 p.m.

Monday, December 18, 2017
Monday, March 19, 2018
Monday, June 18, 2018

Board Members

- ☐ Mark Glendenning, Chair — *Inland*
- ☐ James Hill, Vice Chair — *LADCO*
- ☐ Jodi Roesler, Past Chair — *Dairyland Power Coop*
- ☐ Pete Eide, Secretary/Treasurer — *Bethel Home and Services, Inc.*
- ☐ Marina Abbott — *Manpower*
- ☐ Patti Balacek — *Western Technical College*
- ☐ Judy Berg — *Berg Enterprises*
- ☐ Tammy Brown — *LHI*
- ☐ Greg Erickson — *Plumbers & Steamfitters Local 434*
- ☐ Greg Flogstad — *MRRPC*
- ☐ Becky Grapes — *Badger Corrugating*
- ☐ Amy Grotzke — *Division of Vocational Rehabilitation*
- ☐ Grace Jones — *CouleeCap, Inc.*
- ☐ Ed Johnson — *NECAL*
- ☐ Mary Kessens — *Riverfront, Inc.*
- ☐ Kathleen Olson — *Job Service*
- ☐ Michelle Nowlan — *MarketSharp*
- ☐ Ellen Parker — *Western Wisconsin AFL-CIO*
- ☐ Vicki Proudlock — *Unemployment Insurance*
- ☐ Patrick Rodriguez — *Regional Council of Carpenters*
- ☐ Dave Schams — *Schams Financial Services*
- ☐ Jessica Subach — *Courtesy Corporation*
- ☐ Heather Trimborn — *Gundersen Health System*

Full Board
Meeting Agenda
Monday, October 23, 2017
11:00 a.m. to 12:30 p.m.
AmericInn Hotel & Conference Center
La Crosse Room

Western Wisconsin Workforce Development Board, Inc.

Agenda Item		Page(s)	Action
I.	**CONSENT ITEMS**		
	A. Call to Order		
	B. Announcements and Introductions		
II.	**ORDER OF BUSINESS**		
	A. Presentation and Acceptance of Consent Agenda Items	Pages 4 - 25	**X**
	1. Meeting Minutes June 19, 2017 2. Financials 3. Program Provider Reports 4. Executive Committee Report(s) / Minutes 5. Operations Committee Report(s) / Minutes 6. Strategy Committee Reports(s) / Minutes *Chair will ask Board Members to identify Consent Agenda Items that require further discussion prior to a motion to approve consent items.*		
	B. Acceptance of Consent Agenda Items as presented or with amendment *Motion needed to approve all Consent Items that do not require further discussion.*		**X**
	C. Discussion of Consent Agenda Items as identified in II B above, if applicable *After discussion has taken place, motion needed to approve the called out agenda items.*		
	D. Workforce Development		
	1. Local, Regional, State and National Announcements *Provided by Chair, Board Members, WDB staff or public.*		
	E. Sector Report — Lizz	Page 26	**X**
	F. Economic/Workforce Development Initiatives/Upcoming Events		
	1. EDA Grant Update 2. Career Fair 2017 September 21, 2017 Wrap up		
	G. Contracts Update		
	1. WIOA Adult and Dislocated Worker 2. DOC Windows to Work		
	H. Monitorings		
	1. DWD PY15 Results	Page 27 - 57	**X**
	2. Subcontractor PY16 Report	Handout	**X**

Full Board
Meeting Agenda
Monday, October 23, 2017
11:00 a.m. to 12:30 p.m.
AmericInn Hotel & Conference Center
La Crosse Room

Western Wisconsin Workforce Development Board, Inc.

Agenda Item	Page(s)	Action

I. WWDA Update

J. Board Orientation Schedule

K. Establishment of Cross Functional RFP Taskforce

L. Nomination for Chair Elect Position

Chair will ask three times for nominations for office of chair elect. Chair will then announce slate has been determined and voted upon at annual meeting.

III. CONCLUSION

A. Unfinished Business
B. New Business

IV. ADJOURN

Board Chair: Mark Glendenning
Minute Scribe: Jessie Foss
Meeting Attendance: See Page 3

I. CONSENT ITEMS

A. Call to Order

Mr. Glendenning called the meeting to order at 3:01 p.m. A quorum was present.

B. Announcements and Introductions

Roundtable introductions were made.

II. ORDER OF BUSINESS

A. Presentation and Acceptance of Consent Agenda Items

Consent agenda items presented.

B. Acceptance of Consent Agenda Items as presented or with amendment

Motion made (Hill/Erickson) to approve consent agenda with amendment to the April 17, 2017 minutes to show that Mr. Schams was present and to pull items 2. and 7 for further discussion. Motion carried unanimously.

C. Discussion of Consent Agenda Items as identified in II. B. above

Ms. Sullivan presented a preliminary budget for PY 17. Ms. Sullivan explained the budget is showing a deficit right now, but there will be additional carryover to cover most of the deficit. Ms. Sullivan said allocations will hopefully be out from the state by Friday, June 23 and right now the budget is assuming a 10% cut in funding. The budget will be re-budgeted once final allocations are known.

Motion made (Grapes/Subach) to accept the PY 17 preliminary budget. Motion carried unanimously.

D. Workforce Development

1. Local, Regional, State and National Announcements
   Ms. Sullivan presented the 2016 State of the Workforce. The 2005 and 2016 reports revealed similar patterns, but some significant differences occurred, including those reporting the importance of health benefits in relation to motivation to work; the ideal age of retirement shifted upwards and the confidence in the ability retire dropped.

E. Sector Report

Ms. Boecker handed out a summary of her recent activities. She reported she has been working with Ms. Mitchell on apprenticeships. She also has been reaching out to manufacturers to see if they are aware of apprenticeships. Ms. Boecker also announced two area schools — Onalaska and Necedah — were awarded fabrication lab grants.

F. Economic/Workforce Development Initiatives/Upcoming Event s

1. Transitional Jobs Program Concept
   Ms. Mitchell handed out a concept paper that was taken to the EDA that explained a possible transitional jobs program that would be housed at the Coulee Region Business Center. The next step is for a feasibility study to be conducted because it gives the best chance for funding through the EDA.

2. Career Fair 2017
   Ms. Mitchell provided an update on the job fair that is scheduled for September 21, 2017 at the Omni Center in Onalaska. She said approximately 30 businesses/employers have reserved booths so far.

G. Contracts Updates

1. WIOA Adult and Dislocated Worker

Ms. Mitchell explained the executive committee approved a motion to contract with Workforce Connections for Adult and Dislocated Worker services. The motion included very specific work-based learning requirements. Based on the Deliverables Timetable in the proposal, the following milestones should be met by the end of the second quarter (December 2017) in order to continue the contract:
Work experiences - 5
Transitional jobs - 5
OJT - 5
Customized training - planning and recruitment completed.
If these milestones are not met, there was the option to pull the contract at the six-month mark.
After discussions with Workforce Connections, it was decided there might be some interest in amending the motion to soften some of the requirements and language. Discussion was held on how good faith efforts would be measured.

Motion made (Hill/Parker) to accept the executive committee's minutes/recommendation. Motion approved unanimously.

Motion made (Hill/Schams) to change the language to three work experiences, three transitional jobs, and three OJTs with progress being shown on the other two and to amend the language to state that evidence of good faith effort be sufficient for continuation of contract. Motion approved unanimously.

2. DOC Windows to Work

Ms. Mitchell reported Workforce Connections was the only respondent to the DOC Windows to Work RFP. It is the recommendation of the technical review committee to contract with Workforce Connections for

Motion made (Jones/Subach) to approve Workforce Connections to provide DOC Windows to Work PY 17 services. Motion approved unanimously.

3. One-Stop Operator

Ms. Mitchell reported Workforce Connections was the only respondent to the One-Stop Operator RFP. Ms. Sullivan explained she sent the proposal to DWD to make sure appropriate firewalls were in place in order for Workforce Connections to be the One-Stop Operator. The state said the firewalls are minimally sufficient because DOL hasn't yet defined firewalls. The Technical Review Committee recommended contracting with Workforce Connections as the One-Stop Operator.

Motion made (Schams/Abbott) to approve Workforce Connections as the One-Stop Operator for PY 17. Motion approved unanimously.

H. Staffing

Mr. Glendenning explained an HR taskforce has been created to look at Ms. Sullivan's position/role and gave power to the executive committee to negotiate with Ms. Mitchell becoming the next Western WI WDB manager. The taskfoce came back with the recommendation to change the title to Western WI WDB Executive Director and came up with a salary plan. Ms. Mitchell accepted this proposal. Discussion included agreement that allowance for changes that need to be done, such as changing bank authorizations are included in the spirit of Ms. Mitchell becoming the new director.

Motion made (Schams/Grapes) to approve the executive committee's recommendation to approve Ms. Mitchell as the new Western WI WDB Executive Director and allow for associated transition changes.

I. Training — Work-Based Learning

Ms. Mitchell provided the board a training on work-based learning.

J. Staff/Board Member Recognition

Mr. Glendenning commended Ms. Jones for her 30 years of service on various WDB boards and commended Ms. Sullivan for her years of service to the WDB. Other board members also shared words of thanks and recognition.

III. CONCLUSION

A. Unfinished Business

None.

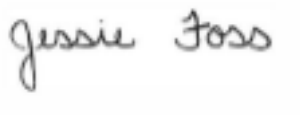
B. New Business

Ms. Sullivan informed new board members that Ms. Mitchell will be planning a board orientation.

IV. ADJOURN

Meeting adjourned at 4:33 p.m.

Respectfully recorded,
Jessie Foss, recorder



Respectfully submitted,
Mark Glendenning

Present	Not Present	Others Present
Mark Glendenning	Jodi Roesler	Stephanie Elmer, DWD
James Hill	Pete Eide	Kelly Norsten, Workforce Connections
Marina Abbott	Patti Balacek	Lizz Boecker, WDB
Judy Berg	Mary Kessens	Teresa Pierce, Workforce Connections
Tammy Brown	Patrick Rodriguez	Jessie Foss, WDB
Greg Erickson		
Greg Flogstad		
Becky Grapes		
Amy Grotzke		
Grace Jones		
Ed Johnson		
Kathleen Olson		
Michelle Nowlan		
Ellen Parker		
Vicki Proudlock		
Dave Schams		
Jessica Subach		
Heather Trimborn		

Western Wisconsin Workforce Development Board

GRANT STATUS REPORT
As of August 31, 2017

	WIOA Administration	WIOA Administration	WIOA Adult	WIOA Adult	WIOA Dislocated Wkr	WIOA Dislocated Wkr
Grant period	7/1/16-6/30/18	7/1/17-6/30/19	7/1/16-6/30/18	7/1/17-6/30/19	7/1/16-6/30/18	7/1/17-6/30/19
Grant available	$ 124,074	$ 102,450	$ 353,097	$ 287,205	$ 325,543	$ 262,868
Prior year expenditures	$ *72,819*	$ -	$ *184,396*	$ -	$ *86,887*	$ -
Current YTD expenditures	$ *13,807*	$ -	$ *35,980*	$ -	$ -	$ -
Total expenditures	$ *86,626*	$ -	$ *220,376*	$ -	$ *86,887*	$ -
Grant balance	$ 37,448	$ 102,450	$ 132,721	$ 287,205	$ 238,656	$ 262,868
Percent Spent	69.82%	0.00%	62.41%	0.00%	26.69%	0.00%

	WIOA Youth	WIOA Youth	DOC WTW	Special Response	Transition	Apprentice
Grant period	7/1/16-6/30/18	7/1/17-6/30/19	7/1/17-6/30/18	7/1/17-6/30/19	7/1/17-6/30/18	7/1/17-6/30/18
Grant available	$ 438,028	$ 371,979	$ 58,000	$ 111,389	$ 140,032	$ 75,681
Prior year expenditures	$ *257,545*	$ -	$ -	$ -	$ -	$ -
Current YTD expenditures	$ *150,711*	$ -	$ *8,056*	$ *6,167*	$ *38,102*	$ *5,159*
Total expenditures	$ *408,256*	$ -	$ *8,056*	$ *6,167*	$ *38,102*	$ *5,159*
Grant balance	$ 29,772	$ 371,979	$ 49,944	$ 105,222	$ 101,930	$ 70,522
Percent Spent	93.20%	0.00%	13.89%	5.54%	27.21%	6.82%

Special Response Grant - This grant covers dislocated workers from the following employers: Eagle Systems and Services, Everbrite, LB&B Associates, ATK, Chartwells, and Foremost Farms.

Dept of Corrections Window to Work (DOC WtW) - This program is to help offenders get back on their feet by helping with employment and surrounding support services.

Rapid Response Transition Grant – This grant is intended to fund Title 1 Adult and Dislocated Worker program services as well as costs incurred in WIOA transition and implementation activities. These activities include WIOA training, new procurements or revised contracts, hiring of additional staff, strategic planning and renegotiation of One-Stop MOU's.

Wisconsin Apprenticeship Growth and Enhancement Strategies (WAGE$) Grant – This grant is intended to fund activities that will lead to additional Registered Apprenticeship opportunities in 3 key sectors – Advanced Manufacturing, Health Care and Information Technology.

WIOA Admin Budget to Actuals (17-18)
Through 8/31/2017
WIOA

	Budget Approved 1st Quarter	Actual Expensed Through 8/31/2017	Budget Remaining (Overspent)	% Expended SL 67%
REVENUE				
Planned Carryover PY 16-17	26,196			
Additional Carryover from PY 16-17	20,000	-		
Projected Allocations	50,049	13,807		
Less Est Carryover-6/30/18	-	-		
TOTAL REVENUE	**96,245**	**13,807**	**-**	**14%**
EXPENSES - OPERATIONAL				
Staff Wages	9,284	6,822	2,462	73%
Staff Fringe	2,894	2,896	(2)	100%
Staff Travel	331	618	(287)	187%
Staff Development	252	-	252	0%
Supplies	283	191	92	67%
Rent	2,160	1,303	857	60%
Telephone	410	210	200	51%
Postage, Printing and Photocopying	198	27	171	14%
IT Access/Tech Support/Software	254	-	254	0%
Licenses, Membership and Fees	1,112	(1,046)	2,158	-94%
Insurances	2,477	-	2,477	0%
LEO, Board Expenses, meeting expenses	424	199	225	47%
Subtotal	20,079	11,221	8,858	56%
Fiscal Agent Expenses	2,763	2,586	177	94%
Current Fiscal Year Expenditures	22,842	13,807	9,035	60%
Prior Year Expenditures	-	-		
TOTAL EXPENSES - OPERATIONAL	**22,842**	**13,807**	**9,035**	
Excess revenue to be budgeted	*73,403*			
Funds used to temporarily cover program costs for grants that were not yet released to the agency		*(0)*		

WIOA DW Budget to Actuals (17-18)
Through 8/31/2017
WIOA

	Budget Approved 1st Quarter	Actual Expensed Through 8/31/2017	Budget Remaining (Overspent)	% Expended SL 67%
REVENUE				
Planned Carryover PY 16-17	65,750			
Additional Carryover from PY 16-17	25,000	-		
Projected Allocations	40,847	-		
Less Est Carryover-6/30/18	-	-		
TOTAL REVENUE	**131,597**	**-**		**0%**
EXPENSES - OPERATIONAL				
Staff Wages	-	-	-	0%
Staff Fringes	-	-	-	0%
Staff Travel	-		-	0%
Staff Development	-	-	-	0%
Supplies	-	-	-	0%
Rent	-	-	-	0%
Telephone	-	-	-	0%
Postage, Printing and Photocopying	-	-	-	0%
IT Access/Tech Support/Software	-	-	-	0%
Licenses, Membership and Fees	-	-	-	0%
Insurances	-	-	-	0%
	-			
Subtotal		-	-	0%
Job center expense	-	-	-	0%
Subcontractors	6,500	-	6,500	0%
TOTAL EXP - OPERATIONAL	**6,500**	**-**	**6,500**	**0%**
Prior Year Expenditures	-	-		
TOTAL FUND EXPENDITURES	**6,500**	**-**		
Excess Revenue to be budgeted	*125,097*			

WIOA Adult Budget to Actuals (17-18)
Through 8/31/2017
WIOA

	Budget Approved 1st Quarter	Actual Expensed Through 8/31/2017	Budget Remaining (Overspent)	% Expended SL 67%
REVENUE				
Planned Carryover PY 16-17	71,506			
Additional Carryover from PY 16-17	25,000			
Projected Allocations	37,617	35,980		
Less Est Carryover-6/30/18	0	-		
TOTAL REVENUE	**134,123**	**35,980**		**27%**
EXPENSES - OPERATIONAL				
Staff Wages	1,283	2,135	(852)	166%
Staff Fringe	370	894	(524)	242%
Staff Travel	95	-	95	0%
Staff Development	46	-	46	0%
Supplies	34	31	3	91%
Rent	6,575	4,235	2,341	64%
Telephone	53	66	(13)	125%
Postage, Printing and Photocopying	24	10	14	40%
IT Access/Tech Support/Software	363	-	363	0%
Licenses, Membership and Fees	135	51	84	38%
Insurance	6	-	6	0%
Board, LEO, Meeting Expenses	11	-	11	0%
Subtotal	8,995	7,421	1,574	83%
Job center expense	-	1,095	(1,095)	0%
Subcontractor Expenses	99,500	27,464	72,036	28%
TOTAL EXP - OPERATIONAL	**108,495**	**35,980**	**72,515**	**33%**
Prior Year Expenditures	-	-		
TOTAL FUND EXPENDITURES	**108,495**	**35,980**	**72,515**	
Excess Revenue to be budgeted	*25,628*			

WIOA Youth Budget to Actuals (17-18)
Through 8/31/2017
WIOA

	Budget Approved Annual	Actual Expensed Through 8/31/2017	Budget Remaining (Overspent)	% Expended SL 17%
REVENUE				
Planned Carryover PY 16-17	87,668			
Additional carryover from PY 16-17	9,000	-		
Projected Allocations	371,979	150,711		
Less Est Carryover-6/30/18	(74,396)	-		
TOTAL REVENUE	**394,251**	**150,711**	**-**	**38%**
EXPENSES - OPERATIONAL				
Salaries/Wages	5,667	2,305	3,362	41%
Staff Fringes	1,687	1,015	672	60%
Staff Travel	337	-	337	0%
Staff Development	184	-	184	0%
Supplies	159	37	122	23%
Rent	9,058	1,649	7,409	18%
Telephone	189	70	119	37%
Postage, Printing and Photocopying	112	10	102	9%
IT, Access/Tech Support/Software	318	-	318	0%
Licenses, Memberships, fees	820	52	768	6%
Job Center and Youth Event	-		-	0%
Insurances	22	-	22	0%
Subtotal	18,553	5,138	13,415	28%
Subcontractor Expenses - WisCorps	367,000	145,574	221,426	40%
TOTAL EXP - OPERATIONAL	**385,553**	**150,711**	**234,842**	**39%**
Prior Year Expenditures	-	-	-	-
TOTAL FUND EXPENDITURES	**385,553**	**150,711**		
Excess Revenue to be budgeted	*8,698*			

PY17 WIOA Adult and Dislocated Worker Monthly Report

Month of _____SEPTEMBER_____

Western Wisconsin Workforce Development Board, Inc.

Scope of Work Outputs - Cumulative

Description	Adult Planned	Adult Actual	Adult Straight-line %	DW Planned	DW Actual	DW Straight-line %
Total Number Served (enrolled)	110	62	56%	125	96	77%
Total Number Carried Over from PY16 (active)		55			88	
Number of New Enrollments		7			8	
Number of Active Enrollees		55			91	
Number of Follow Up Enrollees		56			57	
Caseload size Active and follow up by county	Buffalo: Crawford: Jackson: Juneau: La Crosse: Monroe: Trempealeau: Vernon:	1/0 2/8 3/3 3/8 30/21 11/13 6/1 6/2			0/1 3/4 4/2 4/1 70/36 8/5 1/3 6/5	
Number in Training		17			37	
Number in Training in Demand Industry as identified in WIOA Plan		13			23	
Number Receiving Support Services		13			16	
Number of Successful Close/Total Close		5/8			4/4	
Median Wage at Close		$13.79			$17.09	
Number of credentials attained		38			30	

ADD IN measurable skills gain

Work-Based Learning Performance

Description	Planned	Actual	% Complete	$ Expended	# potential candidates	# potential business sites
OJT	8	3	38%		36	
Transitional Jobs	10	2	20%		18	
Customized/IW Training	1	-	-		NA	
Apprenticeship/Pre-Apprenticeship	5	1	20%		1	
Work Experience	10	-	-		0	

Please provide explanation of activities to meet goals (including outreach, collaboration, business contact/intelligence gathered from another source (Lizz), barriers and potential solutions, and anything else relevant to meeting goals. Also, please identify any new strategies you expect to implement next month.

Monthly meetings began in June with the WDB's Business Service Representative. These meetings consist of the Business Services Rep, WIOA Job Developer and Program Manager. The meetings focus on education and plans to approach businesses and gather information for potential Work Based Learning Opportunities and feedback. Lizz will focus on potential contacts for Customized Training and Reverse Referrals for On the Job Training as well as Incumbent Worker training connections. Program staff will focus on Transitional Jobs, OJT's, and gathering intel for possible Customized Training. Agendas and minutes are kept for these meetings and shared with the board. New marketing materials have been created and are being implemented.

At a program level Case Managers continue to work with the Job Developer to identify participants for the WBL opportunities. Regular meetings occur as well as review at monthly Staff meetings and through database tracking.

On a participant level, we continue educate participants about the benefits of WBL's and compare the opportunities to the person's skills and employment goals. From there their employment plan outlines the goals to meet their objectives which may include WBL opportunities. We ask participants to follow up with workers if they apply for a position so that Staff may follow up with Business to give an OJT overview. September kicked off the implementation of required job search logs from participants active in Job Search. This will provide another tool to connect to business and follow up on applications.

All business contacts are entered into Salesforce. The WDB has access to pull these records. November 1st WCI will make the transition to JCW business and discontinue the use of Salesforce. A brief snap shot of these contacts are as follows for the month of September:

- Presented Customized Training, OJT and Transitional jobs (focusing more on Customized Training) at TUMMA meeting. Businesses present: City Brewery (Monica Redmond), LB White (John Funke), Regal Beloit Corporation (Reva Witte), Duratech Industries (Christine Wehrle) Necedah Screw Machine Products (John Belmonte) PTM LLC (Jeff Kroes)
- Secured an OJT for a referred DW participant to Trane for position of Tool/Die. Start date is pending for October (Lisa Carlson 608-787-2504)
- Referred a DW participant to Organic Valley for OJT (Seri Carl 608-483-2790), promoted an internal candidate.
- Referred DW participant to Lutheran Services of IOWA for position of Care Coordinator (Kristy 319-929-9908). Chose to directly hire without OJT.
- Referred DW to Dahl Ford Automotive for OJT Accounting Assistant (Heather Fee Ladwig, 888-928-6801). Outcome pending.
- Referred an Adult to Brookdale Senior Living for Transitional Job to OJT (Theresa Mulholland 608-788-7730) Outcome pending.
- Referred Adult to Lakeview for CNA for Transition to OJT. Participant was not hired due to undesirable background check.
- Met with LB White (Lisa Kosin 608-783-5691) for Customized Training partnership with WCI. Lisa will connect with Erika second week of October.
- Met with Wisconsin Conservation Corps (WISCORPS Heather Dutcher 608-304-5624) for Transitional Job opportunities. They currently have a maintenance position for Transitional Job opportunity.

- Met with LHI (Logistics Health Inc. Carolyn Moe 866.284.8788 ext. 2662) to schedule a time to evaluate LHI needs for Customized Training. October 12 at 3:00 pm is tentatively planned pending confirmation from Ms. Moe.
- Met with Veterans Assistance Foundation (Dawn Ollendick 608-372-8387) for Transitional jobs. They have retail position available. Will be reaching out to Career planners in the Tomah area for eligible participants.
- Met with Tomah VA (Mike Bergum 608-372-3971) for WISE program, also presented on Transitional Job experiences. Mike is interested in hearing more about Transitional Jobs and will be referring program managers to Erika.
- Referred an Adult to Riverfront for receptionist position for Transitional Job experience. Riverfront is in the currently training different processes and would like to be considered for Transitional Job in October. (Amy Briggs and Denise Lorenz 608-785-3515)
- Participated in the Coulee Region Job Fair and met 69 employers and made connections for future WBL opportunities.
- Met with ABR employment for WIOA adult referrals

Next month's strategies:

- Follow up on Riverfront, Wiscorps and Veterans Assistance Foundation for Transitional jobs.
- Meet with LHI for potential Customized Training Opportunity.
- Finalize OJT with TRANE.
- Secure 3 Transitional Jobs by Octobers end.

QUARTERLY REPORTING ELEMENTS

1. **Number getting initial CP credential and jobbing out:** 0
2. **Number with credential re-entering the CP for the next level of training on the pathway:** 0
3. **Number of co-enrolled participants with source of co-enrollment (i.e. 3 participants co-enrolled with DVR; 4 participants co-enrolled with FSET)**

FSET	**17**
W2	**13**
WISE-Title V	**1**
TAA	**35**

4. **List of files internally monitored and results**

Attached.

WorkforceConnections
Your connection to work and training.

Rapid Response Activity:

7/1/17 through 9/30/2017

Name of Company	Number of employees effected	Employee list collected	Company Meeting Held	Workforce Meeting Held	Number of attendees	Enrollments
La Crosse County - Hillview	10	Yes	Multiple communications	Will not occur, individual contacts only	**NA**	0
Gordy's	Unknown	Yes	5 locations, DWD taking the lead	10/5 at 1pm and 3pm	**3**	0
Authenticom	Unknown	No	Placed calls, no return		**-**	0
K-Mart	68	No	June 21, 2017	8/1 at 7:00am 8/11 at 5:00pm	11	0
Community Health Services	84	No		Will not occur- business sold and will maintain all staff		0

WIOA- WisCorps WORKS Program-

September Report Narrative- 10/13/2017

In September, WisCorps continued preparations for the WisCorps ***WORKS* Fall Session Crew**. Recruiting efforts were focused in Monroe and La Crosse counties. At this time, WisCorps plans to have a ten person youth crew beginning on October 23, 2017. Projects will take place in La Crosse, Sparta, Tomah, and surrounding communities.

WisCorps was very proud to bring back five youth from the WIOA summer session crews to take part on a couple of one- day beautification projects at Norskedalen. Norskedalen was hit hard by the summer storms that came through our area. These youth from our summer session did such an outstanding job this summer that WisCorps' Conservation Program Manager was happy to hire them on for a couple special projects. Two of those youth then went on from that crew to obtain full time employment outside of WisCorps.

WORKS Career Planners continue to remain busy managing their current active and follow up caseloads as well as serving new youth that were enrolled over the summer and fall months. WisCorps Career Planners have been working hard to determine eligibility and enroll those eligible for program services in a timely fashion and exit youth that are ready to move into the follow up phase of the program.

Finally, WisCorps staff continues working diligently with the WDB Manager to navigate changes in our WIOA reporting system and managing all new performance measure changes to the WIOA program.

Submitted by:
Matt Gaworski
WIOA Program Manager
WisCorps, Inc.

Committee Chair: Mark Glendenning
Minute Scribe: Jessie Foss
Meeting Attendance: See Page 2

I. CONSENT ITEMS

A. Call to Order

Mr. Hill called the meeting to order at 2:04 p.m. A quorum was present as indicated by roll call.

B. Announcements and Introductions

None.

II. ORDER OF BUSINESS

A. Meeting Minutes — May 22, 2017

Motion made (Balacek/Glendenning) to approve the May 22, 2017 meeting minutes. Motion carried unanimously.

B. Financials

Ms. Jessie presented the financials via telephone. The grant status report and budget to actual reports were reviewed. No questions were asked.

Motion made (Roesler/Balacek) to approve the financials as presented. Motion carried unanimously.

Based on unanimous consensus of present committee members, no additions were made to the agenda, but the agenda was arranged to move into closed session earlier to accommodate committee member schedules.

C. PY 17 State Contracts

Ms. Mitchell updated committee members on allocations the Western WI WDB has received to date. The WIOA Youth contract totals $371,979 WIOA Youth admin = $41,330 and Rapid Response Transitional grant totals $140,032 . The Western WI WDB is still waiting to hear its WIOA Adult and Dislocated Worker allocations as well as its Department of Corrections Windows to Work allocation.

D. PY 17 Subcontracts Contracts

Ms. Mitchell reported she will finalizing subcontractor contracts as soon as she has received final allocations for all programs from the state.

E. Committee Reports

Ms. Balacek reported on the operations committee's last meeting. She reported the committee went over the Job Center certification, which has now been completed and the committee also looked at the Job Center MOU, which has now been submitted to and accepted by the state.

Mr. Hill reported on the strategic committee's last meeting held Monday, July 17, 2017. During the meeting, Ms. Mitchell sought clarification on the WDB's initiatives; an update was provided on the submission of an EDA feasibility study grant; a discussion was held on jobs created through artificial intelligence. Discussions were also held on the desire of WDB presence on industry advisory committees and the on the development of ad hoc committees related to talent development. Ms. Balacek mentioned the need for a hospitality-focused committee.

III. CLOSED SESSION

Motion made (Balacek/Berg) to move into closed session. Motion carried unanimously.

IV. OPEN SESSION

Motion made (Balacek/Berg) to reconvene in open session. Motion carried unanimously.

Motion made (Balacek/Berg) to increase the Executive Directors salary to $56,160 per year based on initial performance assessment. The salary change is effective August 1, 2017. Executive Director may also increase Administrative Coordinator's hourly wage to $20.50. Motion carried unanimously.

V. CONCLUSION

A. Unfinished Business

None.

A. New Business

None.

VI. ADJOURN

Meeting adjourned at 2:38 p.m.

Respectfully recorded,
Jessie Foss, recorder

Jessie Foss

Respectfully submitted,
James Hill

Present	Not Present	Others Present
Mark Glendenning	Pete Eide	Julie Mitchell, WDB
James Hill		Jessie Foss, WDB
Jodi Roesler		Teresa Pierce, Workforce Connections
Patti Balacek		Betsy Jessie, JRM CPAs
Judy Berg		

Committee Chair: Mark Glendenning
Minute Scribe: Jessie Foss
Meeting Attendance: See Page 2

I. CONSENT ITEMS

A. Call to Order

Mr. Hill called the meeting to order at 3:03 p.m. A quorum was present as indicated by roll call.

B. Announcements and Introductions

Mr. Hill presented LADCO's position paper for an upcoming visit to Madison on October 11. The position paper is aimed at workforce-related issues. Mr. Hill also announced that LADCO's economic forum is scheduled for November 8 and will feature two speakers.

II. ORDER OF BUSINESS

A. Meeting Minutes — July 24, 2017

Motion made (Balacek/Roesler) to approve the July 24, 2017 meeting minutes. Motion carried unanimously.

B. Financials

Ms. Jessie presented the revised June financials and the July financials. She stated that the June financials had been restated in order to reflect additional expenses that were submitted after the close of the fiscal year. Ms. Jessie pointed out that the WIOA Youth contract is 25% expended compared to an 8% straightline expense. This is due wages being paid to summer crews and will even out over the duration of the grant. She also pointed out that the WIOA Dislocated Worker grant is under spent due to expenses being charged to the Transition grant in order to full expend that grant first.

Motion made (Balacek/Glendenning) to approve the financials as presented. Motion carried unanimously.

C. Vacant Vice Chair

Mr. Glendenning explained the need for the vice chair position to be filled. Ms. Mitchell emailed board members to gauge interest in the position and no one expressed interest. Ms. Mitchell said she spoke with Ms. Tammy Brown about filling the vice chair position. The two will be having lunch later this week to further discuss the position.

D. PY 17 Budget

Ms. Mitchell explained that so far a budget was only approved for Quarter 1. The WDB has been waiting for WIOA allocations from the state, but that is not going by October 1. Ms. Mitchell presented a tentative budget for the remainder of the fiscal year.

Motion made (Roesler/Balacek) to approve the PY 17 budget. Motion carried unanimously.

E. Board Recertification

Ms. Mitchell said she is working on the board recertification chart she received from DWD. The chart will be submitted by October 20. DWD will then either ask for clarification or accepted the recertification, which will be good for two years.

F. Requested Benefit Change — 401K to SEP

Ms. Mitchell requested the change for WDB staff's pension program from a 401K program to SEP. SEP would allow for a more economical and flexible option.

Motion made (Glendenning/Roesler) to approve the switch from a 401K program to SEP program. Motion carried unanimously.

G. Committee Reports

Ms. Balacek provided an update on the WDB Operations Committee's August 17th meeting. She said the main item of discussion centered on the PY 15 monitoring report. Ms. Mitchell is working on updating policies to align with the monitoring report. A change was also made to the Policy on Participant Updates. IEPs will now be updated with case managers every six months as opposed to every three months.

III. CONCLUSION

A. Unfinished Business

None.

B. New Business

None.

IV. ADJOURN

Meeting adjourned at 2:32 p.m.

Respectfully recorded,
Jessie Foss, recorder

Jessie Foss

Respectfully submitted,
James Hill

Present	Not Present	Others Present
Mark Glendenning (via telephone)	Pete Eide	Jessie Foss, WDB
Patti Balacek		Betsy Jessie (via telephone), JRM CPAs
Judy Berg		Julie Mitchell, WDB
James Hill		Kelly Norsten, Workforce Connections
Jodi Roesler (via telephone)		

Committee Chair: Patti Balacek
Minute Scribe: Jessie Foss
Meeting Attendance: See Page 2

I. CONSENT ITEMS

A. Call to Order

Ms. Balacek called the meeting to order at 11:02 a.m. A quorum was present as indicated by roll call.

B. Announcements and Introductions

Roundtable introductions were made.

No announcements.

II. ORDER OF BUSINESS

A. Meeting Minutes — May 25, 2017

Motion made (Grapes/Abbott) to approve the May 25, 2017 meeting minutes. Motion carried unanimously.

B. Program and Contract Performance

1. WIOA

Mr. Gaworski presented the WIOA Youth report. He said WisCorps kicked off its summer season on June 13. Thirteen youth received certifications during the first summer session. Summer second sessions began July 24 and will finish on August 11. WisCorps is now beginning its fall recruitment. WisCorps has also partnered with the Hunger Task Force to have an on-site food pantry for WisCorps participants. Mr. Gaworski reported that WisCorps served 67 in-school youth and 71 out-of-school youth during program year 16.

Ms. Norsten presented the WIOA Adult and Dislocated Worker report for Workforce Connections. She said enrollment goals were met for PY 16 and due to several major dislocations, were well exceeded for Dislocated Workers. Due to tighter budgets, Ms. Norsten explained Workforce Connections has been shifting its program design and has been training staff as universal case workers as opposed to program- specific case workers. So far customers are happy and it has been an efficient and effective change.

2. DOC Windows to Work

Ms. Mitchell presented the DOC Windows to Work report. She explained PY 16 was different from previous program years in that DOC allowed for individuals to be served rather than in cohorts. That allowed Workforce Connections to serve 14 individuals during PY 16. Discussion was held by the committee concerning program design, outcomes and who is best served through Windows to Work.

Motion made (Berg/Abbott) to approve the WIOA and DOC Windows to Work reports.
Motion carried unanimously.

3. PY 17 Performance Targets

Ms. Mitchell spoke on PY 17 performance targets. Ms. Mitchell renegotiated with the state some of the performance targets for the youth contract. Exact targets were presented in handout.

4. PY 15 Monitoring Report

Ms. Balacek reported that the WDB received its PY 15 monitoring report. The report will be fully gone through at a later date and some parts of the report will go to other committees to address. Ms. Balacek reported that Ms. Mitchell will be working on updating some policies as a part of the monitoring report.

C. New Operations Policies

Ms. Mitchell presented changes to the Policy on Participant Updates. The biggest change was that IEPs now must updated with case managers every six months as opposed to every three months.

Motion made (Kessens/Powell) to accept changes as indicated. Motion carried unanimously.

III. CONCLUSION

A. Old Business

None.

B. New Business

None.

IV. ADJOURN

Meeting adjourned at 11:49 p.m.

Respectfully recorded,
Jessie Foss, recorder

Jessie Foss

Respectfully submitted,
Patti Balacek

Present	Not Present	Others Present
Marina Abbot	Michelle Nowlan	Jessie Foss, WDB
Patti Balacek	Vicki Proudlock	Matt Gaworski, WisCorps
Judy Berg		Julie Mitchell, WDB
Rebecca Grapes		Kelly Norsten, Workforce Connections
Mary Kessens		
Kathleen Olson		
Ellen Parker		
Roxanna Powell		
Jessica Subach		

Committee Chair: James Hill
Minute Scribe: Jessie Foss
Meeting Attendance: See Page 3

I. CONSENT ITEMS

A. Call to Order

Mr. Hill called the meeting to order at 2:04 p.m. A quorum was present as indicated by roll call.

B. Announcements and Introductions

None.

II. ORDER OF BUSINESS

A. Meeting Minutes — April 10, 2017

Motion made (Glendenning/Brown) to approve the April 10, 2017 meeting minutes.
Motion carried unanimously.

B. Strategic Planning

Ms. Mitchell asked for further explanation on the definitions of strategic initiatives one through three. She would also like to know what the measurement of success will be for these initiatives.

1. Strategic Initiative #1 — Satisfy the needs of our customers
2. Strategic Initiative #2 — Focus on results driven collaboration
   Discussion was held on initiatives #1 and #2. Mr. Glendenning explained that initiative number two was meant to be defined by the job seeker. He said first though the WDB needs to get businesses to understand what the WDB does. Ms. Brown added that it is equally important for the WDB to understand what area employers need. Mr. Glendenning said it should be a 5-year goal for all area businesses to be know what the WDB does and for those businesses to use the WDB as a resource.

3. Strategic Initiative #3 — Focus on talent acquisition and allocation to get results
   Mr. Glendenning explained this initiative was meant for the WDB to assemble a WDB staff that an be assessed against initiatives one and two.

4. Talent Development
   a. K-16 Education System group
      Ms. Boecker updated the committee on the pilot INSPIRE project in Jackson County. She said the platform will be used during the upcoming school year. She also spoke about a manufacturing event that will be held in the first week of October. The WDB is partnering with Western Technical College, La Crosse Area Chamber of Commerce and TUMMA on the event, which will be geared at K-12 schools.

   b. Apprenticeship/Pre-apprenticeship
      Ms. Mitchell spoke about a meeting scheduled for Tuesday, July 25. The meeting is meant to gather information on gaps employers are seeing in apprentices and entry-level employees. Ms. Mitchell also said she has been researching nation-wide apprenticeship curriculum.

   c. Potential transitional jobs social enterprise program at CRBC
      Ms. Mitchell handed out a white paper outlining a potential transitional jobs program that would possibly be housed at the Coulee Region Business Center. A grant will be submitted soon for a feasibility study.

      Mr. Hill said those associated with the CRBC have been considering an expansion, which would allow room for the transitional jobs program.

d. Planning for future skill needs due to automation/technology
Ms. Mitchell handed out a report focusing on the future of jobs. She highlighted several sections concerning how many jobs will be impacted by technology and artificial intelligence and how the workforce should be planning and preparing the workforce for these changes.

A discussion was held on a maker place and the committee directed Ms. Mitchell to explore the possibility of one in the region.

e. Ad-hoc committee discussion
It was decided a group should be formed to look at the creation of ad-hoc committees that would look at specific industries and what is upcoming for them in the next decade.

C. Partnership Development

1. Sector Partnerships
   a. TUMMA
   Ms. Boecker provided an update on TUMMA activities, including a validation the group and Western Technical College will be hosting. She also reminded the committee about the job fair in September.

   b. Other potential industries for development: transportation & IT
   Ms. Mitchell presented a handout offering two suggestions for sectors for Ms. Boecker to next focus on. Discussion centered around IT, specifically what area educational institutions are teaching future IT professionals versus specific skills employers are looking for in IT professionals.

   Motion made (Brown/Erickson) to have the WDB add an emphasis to IT as a part of its sector initiatives.

2. Economic Development
Ms. Mitchell said an EDA grant for a feasibility study at the CRBC is currently being reviewed before submission. The feasibility study would consider whether the current commercial kitchen at the CRBC should be expanded in order to house a transitional jobs program or whether a new facility should be built.

3. Agencies serving untapped labor pool
Agenda item was skipped

4. Advisory committees from major industries (mfg, healthcare, IT, transp) discussion
Discussion was held on the possibility of forming committees aligned along industries. A suggestion was to join with Western's committees. Ms. Mitchell was directed to discuss with possibility with Ms. Balacek.

III. CONCLUSION

A. Unfinished Business

None.

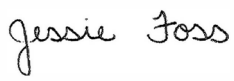
A. New Business

None.

IV. ADJOURN

Meeting adjourned at 3:17 p.m.

Respectfully recorded,
Jessie Foss, recorder



Respectfully submitted,
James Hill

Present	Not Present	Others Present
James Hill	Amy Grotzke	Julie Mitchell, WDB
Mark Glendenning	Cheryl Gullicksrud	Lizz Boecker, WDB
Greg Erickson	Amanda Jalensky	Jessie Foss, WDB
Tammy Brown	Greg Flogstad	Teresa Pierce, Workforce Connections
Patrick Rodriguez		Kelly Norsten, Workforce Connections
Dave Schams		
Heather Trimborn		

Business Services Coordinator

PY2016 Recap Sept 19, 2016—June 30th, 2017

***55** Business tours majority manufacturing in the 7 Rivers Region*

Personally visited with over 20 educators and TUMMA supported 5 career fairs and arranged 5 manufacturing experts to speak with students.

***18** Community events attended as Business Services Rep/TUMMA*

***32** total members—**8** new members in PY2016*

Involvement

Active in WISE Plan—TUMMA sponsored workgroups, focus groups.

Active as WDB/TUMMA representative on INSPIRE rollout.

Active in Youth Apprenticeship Consortium

Recruiting businesses to increase interest in Apprenticeship sponsorship.

Involved in Workforce Development Center Onsite Recuritment Events/ mini Job Fairs

Other achievements

New marketing material for Business services team—Folder

New marketing material for TUMMA business and Educators.

Surveys completed of TECH Ed teachers on what programing they would like to see happening.

Survey for Apprenticeship interest

What's next

IT sector

Manufacturing week

Apprenticeship / Pre apprenticeship

BST marketing material consistency

Coulee Region Job Fair

STATE OF WISCONSIN
DWD
Department of Workforce Development

2016-17 WIOA
COORDINATED MONITORING REPORT

Program, Fiscal, and Equal Opportunity

Western Wisconsin Workforce Development Board

DWD Compliance Officers:

Equal Opportunity: David Duran (Lead)
Fiscal: Annette Meudt (Lead), Sumanpreet Ghuman, Jean Bink-McGrath, Babucarr Kebbeh
Program: Stephanie Elmer (Lead), Sandra Hiebert, Aaron Sarbacker

On-site Monitoring Dates:
April 24 – April 27, 2017

Issued on July 24, 2017 by the Department of Workforce Development/ Division of Employment & Training.

WESTERN WISCONSIN WORKFORCE DEVELOPMENT BOARD
2016-17 MONITORING REPORT

EXECUTIVE SUMMARY

Annual on-site monitoring is an important activity in the overall management of Wisconsin's Workforce Investment Act (WIA) and Workforce Innovation and Opportunity Act (WIOA) programs.

The purpose of the review is to:

- Ensure the programs comply with appropriate policies and procedures and operate within the parameters established by law, regulations, the State WIOA Plan, the Local WIOA Plan, Equal Opportunity (EO) and Nondiscrimination policies, and program guidelines.
- Assess the quality of services provided to program participants and employers, and where appropriate, make recommendations for improvement.
- Evaluate the management and administration of WIA/WIOA funded grants with the Department in order to determine if program operations are compliant and whether the Workforce Development Board (WDB) is on track to achieve grant goals and outcomes.
- Provide technical assistance as needed or requested.
- Identify system-wide issues requiring policy or program review and resolution.
- Identify positive practices and share with others in the workforce development system.
- Assess impacts of workforce programs for customers within the workforce development area.
- Provide technical assistance for WIOA readiness and implementation

SCOPE OF REVIEW

The following items and activities were part of the review:

- Interviews with WDB staff,
- Review of local WDB practices and policies, and
- Review of a sample of adult, dislocated worker (DW), and youth and young adult participant case files.

The review of Western Wisconsin WDB (WWWDB) was conducted during the period of April 24 – 27, 2017, with an exit conference held on April 27, 2017. The Coordinated Review Team consisted of the following monitors:

- EO: David Duran (Lead)
- Fiscal: Annette Meudt (Lead), Jean Bink-McGrath, Sumanpreet Ghuman, and Babucarr Kebbeh
- Program: Stephanie Elmer (Lead), Sandra Hiebert, and Aaron Sarbacker

TERMINOLOGY AND OVERVIEW MATRIX

Terms utilized in this report were identified in the United States Department of Labor's (US DOL) "Ten Steps to Developing an Effective State Monitoring System." The matrix below identifies any findings, areas of concern, and positive practices by topic area.

- **Finding** - the identification of a specific federal/state law, policy or procedure or local policy or procedure which the WDB has failed to comply with that is serious enough to require corrective action.
- **Required Action** - step or steps that are necessary to address a Finding. It is the Department of Workforce Development's (DWD) expectation that the WDB will develop a corrective action plan, as appropriate.
- **Area of Concern** - administrative or management practices that do not represent instances of non-compliance but could become compliance problems in the future, if not addressed.
- **Recommendation** - suggested action steps to address Areas of Concern that, in DWD's opinion, will improve the program or practice. The WDB is not required to adopt DWD's specific recommendation.
- **Positive Practice** - used to highlight positive aspects of programs that may be shared with other WDBs to help improve their programs.

AREA	FINDING	AREA OF CONCERN	POSITIVE PRACTICE
A-1 Real Property			
A-2 Equipment			
A-3 Procurement	1	2	
A-4 Monitoring and Contracts			
A-5 Internal Controls			
A-6 Written Fiscal and Personnel Policies	1		
A-7 Audits and Audit Resolution			
A-8 Budget Controls			
A-9 Personnel			
A-10 Cash Management			
A-11 Fiscal Reporting	1	1	
A-12 Indirect Cost Rate			
A-13 Voucher Testing			
A-14 Participant Files		4	2
A-15 Equal Opportunity			
A-16 Eligibility and Services	1		
A-17 On-the-Job (OJT) File Review			
A-18 Oversight of Service Providers			
A-19 Performance Measures			
A-20 Selective Service Registration			
A-21 Training Services			
A-22 Work Experience Agreement			
A-23 Youth and Young Adult Monitoring Guide			

I. FINDINGS

There are three Findings related to fiscal management and one Finding related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-3 PROCUREMENT (FISCAL)

FINDING 1:

- Procurement Must Be Conducted with Full and Open Competition.
    - **STANDARD:** Uniform Guidance 200.319(a) "All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section."
      CONDITION (CAUSE AND EFFECT): WWWDB's policy for the Technical Review of Proposals WWWDB "reserves the right to make selections based solely on the final scores or to take into consideration of other relevant factors". Procurement cannot be full and open if criteria outside of the procurement process are used to make the decision.
      QUESTIONED COST: None
      RECOMMENDATION: The Request for Proposal (RFP) be reissued after the first year of service ensure full and open competition

- Criteria for contract selection must be published in the RFP and used in the selection process. This is a repeat finding.

    - **STANDARD:** Uniform Guidance 200.319(c)(2) **Identify all** requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.
      CONDITION (CAUSE AND EFFECT): WWWDB's policy for the Technical Review of Proposals WWWDB "reserves the right to make selections based solely on the final scores or to take into consideration of other relevant factors". By definition, these relevant factors would have been excluded from the RFP or their consideration would have occurred during the rating process.
      QUESTIONED COST: None
      RECOMMENDATION: The contract for Youth not be renewed and a new RFP be issued after one year to ensure full and open competition.

- WWWDB did not document how the responsible firm constitutes the most advantageous to the program.

    - **STANDARD:** Uniform Guidance 200.318(a)(7) "Contracts must be awarded to the responsible firm **whose proposal is most advantageous to the program."**

*NOTE: These are all repeat findings

A-6 WRITTEN FISCAL AND PERSONNEL POLICIES

FINDING 2:

- Required Conflict of Interest Policy is Not Established.
    - **STANDARD:** Uniform Guidance 200.318 (c) (1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest."
      CONDITION (CAUSE AND EFFECT): The WWWDB Personnel Policies allows an employee to have an interest in a contract paid by WWWDB if the contract was competitively bid. Uniform Guidance specifically prohibits an employee, officer, or agent from participating in the selection, award, or administration of a contract.
      QUESTIONED COST: None
      REQUIRED ACTION: WWWDB is required to update its Personnel Policy to reflect current regulations.

- Required Allowability Policy is Not Established. This was an Area of Concern in 2015-2016.
    - **STANDARD:** Uniform Guidance 200.302 (b) (7) "The financial management system of each non-Federal entity must provide for the following: Written procedures for determining the allowability of costs. . ."
      CONDITION (CAUSE AND EFFECT): The WWWDB Financial Policies and Procedures Manual references "WIOA Policies and Procedures Manual" for criteria on Allowability. This Manual has never existed.
      QUESTIONED COST: None
      REQUIRED ACTION: WWWDB is required to update its policy to reflect current regulations.

- Required Record Retention Policy is Not Established. This was an Area of Concern in 2015-2016.
    - **STANDARD:** Uniform Guidance 200.333 "Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years." WIA Policy Update 07-05 - A program participant files must be retained for seven consecutive years after the participant exists from US DOL funded programs.
      CONDITION (CAUSE AND EFFECT): The WWWDB Financial Policies and Procedures Manual states the record retention policy for the sub-award but does not include record retention policy for the WWWDB. The WWWDB Financial Policies and Procedures Manual requires the sub-award to retain records for three years. DWD WIA Policy Update 07-05 requires a seven-year retention period for participant files.
      QUESTIONED COST: None
      REQUIRED ACTION: WWWDB is required to update its policy to reflect the circumstances and requirements for both the three-year and the seven-year record retention requirement.

A-11 FISCAL REPORTING

FINDING 3: Unliquidated Obligations are not being reported on the Financial Status Reports (FSR).

STANDARD: UG 200.331(d)(1) Requirements Pass-through and UG 200.302(b)(3) Financial Management.

CONDITION: WDB has not been reporting obligations with service providers on their FSRs.

QUESTIONED COST: None

REQUIRED ACTION: Any Obligations must be reported on the FSR's monthly.

A-16 ELIGIBILITY AND SERVICES

FINDING 4: DW eligibility documentation issue

STANDARD: DW eligibility must comply with WIOA Federal Regulations, 20 CFR 680.120 – 680.130 and the WIOA Title 1 Eligibility Determination and Documentation Technical Assistance Guide (TAG), pages 9-10. In order to receive services in the DW Program, individuals must:

1. Meet general eligibility criteria;
2. Meet the Federal definition of "DW" at WIOA Sec 3(15); and
3. Meet all three State eligibility criteria.

Appropriate documentation related to eligibility must be retained in the participant file, and applicable data entered into Automated System Support for Employment and Training (ASSET). Eligibility requirements must clearly, and without question, be satisfied and documented prior to the provision of any Individualized, Training, or Supportive services, and especially before obligating or vouchering any funds for the individual.

Failure to meet eligibility requirements could result in disallowed costs.

CONDITION: The following files contained eligibility problems**:**

PIN 1876046: Participation date is 02/16/2016, but according to case note #4465763 dated 3/17/2016: Career Planner requested Unemployment Insurance (UI) documentation and DD-214. Despite this case note:

- There is no additional case note indicating when those documents were received.
- Documents are present in file, but are not date stamped.
- UI Documentation in file has a "mailed date" of 02/25/2016 – after the participation date.
- Selective Service documentation in the file is dated 04/16/2016 – after the participation date.

The participant received Career, Staff Assisted, Individualized and Supportive services prior to the completion of the eligibility determination. This includes issuance of two vouchers (#17783 dated 3/19/2016 – 6/1/2016 for CMQ/OE Certification preparation in the amount of $1038) and (#17782 dated 3/19/2016 for transportation assistance in the amount of $180).

PIN 630814: There is inadequate documentation of "unlikely to return to a previous industry or occupation".

PIN 1532808: DW Federal Criterion #1.a was selected, but the participant file does not contain UI documentation.

QUESTIONED COSTS: All direct costs (training, supportive services) spent on ineligible participants must be reimbursed by the board to the WIOA Program with non-federal funds.

REQUIRED ACTIONS: PIN 1876046—WWWDB must provide clear documentation to prove the eligibility criteria were met prior to any direct cost expenditures. If no documentation can be produced, the Board must provide an itemized list of all direct costs spent on the participant.

PIN 1532808—WWWDB must provide UI documentation to provide the eligibility criterion was met, or provide proof that the participant meets another DW Federal Criterion. The participant file does show indications that there could be eligibility under Federal Criterion #2. Corrective action for this case would be to either provide the UI documentation, or properly identify the eligibility under criterion two, and submit the ASSET staff request to change the Federal Criterion.

Once this information is provided, Division of Employment and Training (DET) will instruct WWWDB on when and how to reimburse any disallowed costs.

RECOMMENDATIONS: Career Planners should ensure that all required documents are received and validated prior to completing enrollment in ASSET. Career Planners should also ensure that information gathered from the individual's signed application accurately reflects the information that is entered into ASSET. Documents received by career planners, especially those related to eligibility, should be date stamped at the time of receipt, and corresponding case notes should be entered in ASSET.

I. AREAS OF CONCERN

There are three Areas of Concern related to fiscal management and four Areas of Concern related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-3 PROCUREMENT

AREA OF CONCERN 1: Conditions for noncompetitive proposals.

STANDARD: Uniform Guidance 200.320(f)
Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:
(1) The item is available only from a single source;
(2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
(3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
(4) After solicitation of a number of sources, competition is determined inadequate.

CONDITION: (CAUSE AND EFFECT):
There are four conditions under which a non-competitive proposal can be used. WWWDB has added two more conditions which are not authorized.

QUESTIONED COST: None.

RECOMMENDATION: WWWDB is required to eliminate the two unauthorized conditions for a non-competitive proposal.

AREA OF CONCERN 2: Consideration of special populations.

STANDARD: Uniform Guidance 200.321(a)
The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

CONDITION: (CAUSE AND EFFECT):
WWWDB's Financial Policy and Procedures Manual considers small and minority-owned businesses in purchasing decisions, thereby excluding by omission women's business enterprises, and labor surplus area firms which may cause difficulties in the future.

QUESTIONED COST: None.

RECOMMENDATION: WWWDB is required to include women's business enterprises and labor surplus area firms to their Financial Policy and Procedures Manual.

A-11 FISCAL REPORTING

AREA OF CONCERN 3: Leveraged resources are not being reported on the FSR's.

STANDARD: UG 200.331(d)(1) Requirements Pass-through and UG 200.302(b)(3) Financial Management.

CONDITION: WDB's are required to report any leveraged resources. Leveraged funds are all resources used to support the WIOA Title 1 Grant activities and desired outcomes.

RECOMMENDATION: WDB must work with their service providers to compile and report the leveraged resources on all WIOA TITLE 1 Grants.

A-14 PARTICIPANT FILES

AREA OF CONCERN 4: Low income determination and documentation problems

STANDARD: Low Income Determination must be completed per WIOA Section 3(36)(A)(ii)(II), and 3(36)(B), as well as WIOA Final Rules Section 681.280. WIOA Title I programs have two uses for income determinations: First, is the eligibility for the Youth/Young Adult program, where the information is a part of the in-school and out-of-school eligibility criteria. The second is to determine priority of service for the Adult Program.

CONDITION: The following issues were identified during the file review:

PIN 1532808, DW

- Income in participant file is not calculated for the past six months or annualized

PIN 1671084, DW

- Family composition of three includes participant's mother, who does not meet the WIOA definition of family, and includes the mother's social security income. Family size should be two, to include the participant and her son. Participant's income for last six months is $6543.83, annualized=$13087.66—for a family of two, this income would fall below 70% of Lower Living Standard Income Level (LLSIL), which makes the ASSET entry incorrect.

PIN 140284, Adult

- Family size of two includes grandfather, who does not meet the WIOA definition of family. Family size should = one.
- Grandfather's income (railroad pension) is used incorrectly in income calculation, which put the participant over Federal Poverty Level (FPL)/LLSIL.
- Participant receives a Trust Fund, but Trust Fund income was not clearly documented or used in income calculation.
- ASSET entry regarding income could be incorrect based on inaccurate determination of family size and use of non-family-member's income.

RECOMMENDATION: The WWWDB has very strong forms, which are designed to properly capture appropriate income information for eligibility determination and ASSET reporting. Career Planners should ensure that they understand the proper definitions and terms for determining family size, and understand whether to include that income when completing the forms.

AREA OF CONCERN 5: ASSET Reporting Errors

STANDARD: ASSET is used to track data for customers receiving services under the WIOA programs. The accuracy and completeness of data is critical for accurate federal reporting, resource planning, monitoring/evaluation, and state and local program management. WDBs should ensure that ASSET reporting complies with WIOA policies, the ASSET User's Manual, and local WDB policies.

The Federal DOL requires all states to complete annual data validation to verify that randomly selected demographic, performance, and service-related data is accurate and agrees with documents contained in the corresponding participant file and ASSET case notes. It is especially crucial that data fields directly impacting performance outcomes and/or the Statistical Adjustment Model be completed accurately. ASSET Manage Services must show accurate actual open and close dates for services provided to participants. Annual data validation requires some services to be an exact date match (e.g. first day of staff-assisted service, training start and end dates, etc.) WIA Policy 13-05, issued 2/19/2014, indicates that other services should be relative to when the service started and ended (e.g. supportive services, incentives, job search, etc.). Acceptable data validation sources can be found in the Eligibility TAG, WIA Policy Manual, and Training and Employment Guidance Letter (TEGL) 22-15. A complete list of services directly impacting performance and/or affecting the Statistical Adjustment Model can be found in the Performance TAG.

WIA Policy 06-07, issued 6/29/2006, states that qualifying certificates/credentials must be reported in ASSET Manage Follow-Ups and documentation validating certificate/credential attainment should be placed in the participant file. Reporting credentials in ASSET is crucial since credential attainment is a performance indicator under WIOA.

In general, information entered in ASSET should correspond directly with documentation contained in the participant file, and information entered in case notes, and vice versa.

CONDITION: The following PIN numbers and the assorted issues were identified during the file reviews conducted during the monitoring:

PIN 1876046, DW

- Individual Employment Plan (IEP) in file created and signed 2/16/2016; date does not match ASSET service date 2/23/2016
- IEP in file dated 3/22/2016 does not have corresponding ASSET service
- IEP in file dated 4/25/2016; date does not match ASSET service date 4/26/2016
- Voucher #17783 dated 3/16/2016-6/1/2016; dates do not match ASSET service dates 3/16/2016-3/21/2016

PIN 1205142, DW

- IEP signature page present in file dated 4/8/2017; no corresponding service in ASSET
- Voucher #17234 in participant file for training; no corresponding service in ASSET
- Occupational Classroom in ASSET dated 9/30/2016; no details in case notes or participant file to support the training
- Summer training is mentioned in case notes; but no corresponding service in ASSET

PIN 1532808, DW

- Job Search Knowledge Scale (JSKS) and Liberal Education and America's Promise (LEAP) assessments present in file; no corresponding Assessment-Comprehensive & Specialized service(s) in ASSET
- Certified Nursing Assistant (CNA) License dated 6/20/2014 was entered in ASSET Manage Follow-ups Credentials as an Occupational Certificate (wrong category)
- CNA Certification present in file dated 12/17/2013 was not entered in ASSET Manage Follow-ups Credentials
- IEP in file dated 5/13/2013; no corresponding service in ASSET
- CNA training dates documented in the participant file (9/3/2013-12/17/2013) do not match ASSET service dates (8/23/2013-12/18/2013)
- Voucher #10794 dated 4/21/2014-5/21/2014 for $70 for CNA exam; no corresponding service in ASSET
- Voucher #12528 dated 12/11/2014-12/14/2014 for $68 for Transportation Assistance; no corresponding service in ASSET
- Voucher #15754 dated 10/21/2015-11/13/2015 for $200 for scrubs/attire; no corresponding service in ASSET
- Other Support Service in ASSET dated 1/12/2015-2/28/2015 comments show for mileage—should be entered as Transportation Assistance

PIN 1850081, DW

- Rapid Response Grant fields in ASSET Manage Programs not completed appropriately

PIN 1671084, DW

- Planned Gaps in Service entered in ASSET dated 9/7/2016-12/12/2016, and 12/13/2016-Present—it is unclear why the Planned Gap was closed on 12/12/2016 and reopened the next day, instead of continuing as one service.
- Credential date in ASSET Manage Follow-ups credential (12/18/2015) does not match date of certification in file (12/17/2015)
- Credential in file for Western Technical College Frontline Services dated 8/19/2015 not entered in ASSET Manage Follow-ups Credential
- IEP in file dated 12/18/2015; ASSET service dates (12/15/2015-12/28/2015) do not correspond
- IEP in file dated 7/18/2016 and signed 8/1/2016; ASSET service dated 8/2/2016 does not correspond
- In training already at time of intake—should have Occupational Classroom service open dated 6/29/2015-8/22/2015 with Other Non-WIOA fund source to reflect accurate activities

PIN 1899340, DW

- Rapid Response Grant (RRG) fields in ASSET Manage Programs not completed accurately
- Three separate services in ASSET for Housing Assistance—two of the services include reference to the same voucher #, one using the WIODW fund source and the other using the RRG fund source

PIN 1901393, DW

- RRG fields not completed accurately in Manage Programs
- Voucher #18547 dated 5/5/2016-5/13/2016 for $100 for Transportation Assistance; ASSET service dates (5/1/2016-5/31/2016) do not match voucher dates
- Multiple transportation vouchers present in file but only one service entered in ASSET
  - Voucher #18547, $100, 5/5/2016-5/13/2016
  - Voucher #18637, $500, 5/1/2016-5/31/2016
  - Voucher #18661, $200, 5/16/2016-5/27/2016

PIN 1682863, Adult

- IEP in file dated 12/1/2014; no corresponding service in ASSET
- IEP in file dated 8/27/2015, ASSET service date 9/1/2015 does not match

PIN 340265, Adult

- Skills Upgrading & Retraining service in ASSET dated 4/20/2015-6/30/2015 has "Other" fund source, but has an established Individual Training Account (ITA)
- Welding certification training was entered as Skills Upgrading & Retraining, but should be Occupational Classroom (Other Non-WIA funding, no ITA)
- Participant was already in training at participation date—start date of training service should be 4/21/2015 (not 4/30/2015)
- Transportation Assistance service dated 4/27/2015-9/30/2015—dates do not match voucher dates in the file
  - #13776, $600, 4/22/2015-6/25/2015
  - #14453, $620, 7/6/2015-7/31/2015

  Service dates should be 4/22/2015-7/31/2015

- Multiple Transportation Assistance services entered in ASSET for the same vouchers. Services opened 4/27/2015-9/30/2015 and 7/6/2015-7/31/2015.

PIN 855385, Adult

- Transportation Assistance vouchers issued, but no corresponding services entered in ASSET
  - #19367, $45.50, 7/13/2016-7/29/2016 to Ace Cab Co.
- #14371, $238.99, 7/3/2015-7/10/2015 to Denny's Truck & Auto Service—dates on voucher do not match date (7/6/2015) entered in ASSET

PIN 1886175, Adult

- Case notes document referral to Division of Vocational Rehabilitation, but no corresponding referral service in ASSET

PIN 1884486, Adult

- Resume development indicated in file and case notes; no corresponding service in ASSET
- Referrals to public assistance, medical assistance, career counseling, training, apprenticeship, and NCRC were made, but not documented appropriately in ASSET.

PIN 140284, Adult

- Employment status in ASSET is "Employed" but documentation in the participant file shows the only income is from a Trust Fund. Should be "Not Employed"
- Participant is co-enrolled in FoodShare Employment and Training program, but corresponding service not entered in ASSET

RECOMMENDATION: The WDB must correct the issues listed above for any participants who are still active. These errors should be discussed with career planners and the importance of completing data fields correctly in ASSET should be reiterated. ASSET Staff Requests must be submitted to correct all errors related to performance and follow-up for closed files. Career planners should also ensure that information gathered from the individual's signed application, or documented elsewhere in the participant file, accurately reflects the information entered in ASSET.

The WDB should develop and implement quality assurance measures to ensure that all data fields related to performance are completed accurately. Career planners should be trained on these procedures.

AREA OF CONCERN 6: Case Management Issues

STANDARD: A participant's success comes from within but also depends on effective case management built on a solid foundation of comprehensive qualitative and quantitative assessments and development of strong IEPs for Adult and DW participants, and Individual Service Strategies (ISS) for Youth participants. One way to measure case management practices during monitoring is to look at the quality and frequency of IEP and ISS documents, frequency of career planner contact with the participant, and the quality and frequency of ASSET case notes. In the absence of strong assessment and IEP/ISS development processes, quality documentation of those processes, and regular participant contact, individual outcomes as well as local and state performance outcomes can suffer.

Per the WIA Policy Manual, the IEP/ISS is an ongoing strategy jointly developed, signed and dated by the participant and the case manager. The IEP/ISS documents and describes the participant's employment goals, achievement objectives, determination of need for training, and the appropriate combination of services for the participant to achieve the objectives. IEPs/ISSs should be reviewed periodically and updated as needed (a minimum of every six months is recommended).

The WDB's Local Plan VI.C.9 indicates that contact with active participants will occur at minimum, every three months. The contact must be documented in case file/notes and ideally signed by case manager and participant. If no signature, reason why not must be documented in case notes.

The WDB's Local Plan VI.H.13. indicates that youth program participants are required to be reviewed/updated at minimum, every three months. This must be documented in case file/notes and ideally signed by case manager and participant. If no signature, then a reason why it is not signed must be documented in case notes.

Both the WDB Local Plan and DWD require that all contacts are documented in ASSET case notes.

WDBs must ensure that case management and ASSET entry comply with federal, state, and local policies. DET expects to see the following practices in place when conducting participant file and ASSET review:

Case notes must be complete; align with ASSET Manage Services, participant file documentation, and that participant's employment plan; and are updated in accordance with the WDB's Local Plan.

IEP and ISS documents must be aligned with ASSET Manage Services, participant file documentation, and ASSET case notes; be signed and dated by the participant and case manager; and be updated in accordance with the WDB's Local Plan. Priority of Service must be provided in accordance with federal, state, and local policy. Per Administrators Memo 16-06 dated July 22, 2016, "all participants enrolling in the Adult Program, who are not low income or public assistance recipients, must complete the screener DETW-18156-E to determine if an individual is basic skill deficient."

Non-Traditional Occupations (NTO) must be discussed with all participants. WIOA Federal Regulation 682.200(b)(1) states that one of the required statewide employment and training activities includes providing information about the State list of eligible training providers (including those providing non-traditional training services). Furthermore, ASSET Manage Programs/Title 1 contains two data fields pertaining to NTO; one asks if it was discussed with the participant and the other asks if the participant was interested. Case managers are expected to complete both data fields.

When a participant is served by multiple funding sources, coordination between program case managers is required to maximize services with available funds. WIOA Federal Regulation 680.230(a)(1) states that WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training. And 680.230(b) places responsibility on the one-stop center to coordinate available training funds. 680.330(e) allows for coordination of ITA funding with funding from other programs.

Participants should be informed at enrollment of how often and under what conditions they are required to contact their career planner. WDBs should have policies and procedures in place to routinely monitor that all participants are engaged in their services, are staying in contact with their career planner, and that ASSET Manage Service dates are not artificially extended. Cases of lost contact or disengagement in services should result in exit according to the local policies and procedures.

CONDITION: The following PIN numbers and the assorted issues were identified during the file reviews conducted during the monitoring:

PIN 1876046, DW

- Follow-ups are not documented in Manage Follow-ups Follow-up status
- Follow-up activities are not adequately case noted in ASSET

PIN 630814, DW

- IEP not updated every three months as required by local policy; 4/15/2015-9/30/2015, 9/30/2015-8/8/2016
- IEP update in file dated 11/14/2016, several months after system-generated exit date of 8/16/2016
- Transportation Assistance was provided by Trade Adjustment Assistance (TAA) 8/24/2015-2/22/2016; and by WIOA 10/1/2015-10/31/2015 during the same timeframe. TAA was funding transportation for training, and WIOA paid transportation for employment-related activities during the same timeframe. Shows poor coordination of services.

PIN 906822, DW

- IEP not updated every three months as required by local policy; 3/17/2016-8/22/2016-no update
- IEP does not identify supportive service needs

PIN 1530105, DW

- IEP does not identify Childcare Assistance as a necessary supportive service.

PIN 1205142, DW

- IEP not updated every three months as required by local policy; 12/31/2015-5/6/2016, 5/6/2016-1/5/2017
- IEP dated 1/5/2017 is not signed by the participant
- Gap in case notes: 11/4/2016-3/7/2017

PIN 1532808, DW

- Employment status in ASSET (Employed) does not match documentation in participant file showing the participant had received notice of termination/layoff at intake
- NTOs in ASSET marked "No"; does not match signed Participant Rights & Responsibilities form in file
- IEP not updated every three months as required by local policy; 5/13/2013-11/17/2014, 11/17/2014-6/28/2016
- Follow-ups not completed accurately—not entered in Manage Follow-ups Status, no case notes entered after the exit date, follow-up services have planned dates only

PIN 1671084, DW

- IEP not updated every three months as required by local policy; 6/29/2015-12/18/2015, 12/18/2015-7/18/2016, 7/18/2016-Present

PIN 1901393, DW

- IEP does not clearly identify participant's career goal(s)
- IEP not updated every three months as required by local policy; 4/25/2016-3/22/2017

PIN 1682863, Adult

- IEP not updated every three months as required by local policy
- IEP does not document need for supportive services

PIN 1539560, Adult

- IEP not updated every three months as required by local policy; 4/29/2013-7/21/2014
- First ASSET case note entered is several months after participation date

PIN 340265, Adult

- IEP not updated every three months as required by local policy; 4/28/2015-no update through exit date
- Gaps in case notes: 12/2/2015-6/13/2016, 8/22/2016-Present (per CN #4727340 dated 2/17/2017 indicates participant requested no contact)

PIN 855385, Adult

- Initial IEP developed 6/1/2015—several months after participation date
- IEP not updated every three months as required by local policy; 6/1/2015-4/13/2016, 4/13/2016-exit
- Q1 follow-up not entered in Manage Follow-ups Status
- Supportive service need not documented on IEP
- Case note #4597589 dated 9/1/2016 indicates participant will be exited to employment—this does not match the system-generated exit date of 11/4/2016. Case Management and Assisted Job Search & Placement services remained open in ASSET, but no services were being provided during that timeframe.
- Gaps in case notes: 1/4/2016-4/5/2016, 10/7/2015-1/4/2016

PIN 653406, Adult

- IEPs not updated every three months as required by local policy; 5/31/2016-11/3/2016, 11/3/2016-3/22/2017
- IEP updates dated 11/3/2016 and 3/22/2017 are not signed
- WIOA funded CNA test, but no test results present in file

PIN 1886175, Adult

- Supportive services provided (steel toed boots) were not identified in the IEP
- Final IEP shows Welding certificate as a goal, but case note #4533951 states he finished training and did not like it.
- IEP not updated every three months as required by local policy.
- Assessment results (social) not used to information career/training goals (Welding)

PIN 1743916, Adult

- IEP not updated every three months as required by local policy

PIN 1884486, Adult

- IEP not updated every three months as required by local policy; 10/25/2016-3/23/2017, 3/7/2016-9/22/2016
- IEP does not identify specific career goals
- Case note #4457908 dated 3/7/2016 indicates the participant's career goal is Automotive Technology—this is not clearly reflected on the IEP.
- Gaps in case notes: 10/25/2016-3/27/2017

PIN 140284, Adult

- IEP not updated every three months as required by local policy; 2/18/2016-9/30/2016, 9/30/2016-1/17/2016
- IEP does not include the participant's career/training goals
- Gaps in case notes: 10/21/2016-1/17/2017

RECOMMENDATION:
The WDB must reiterate to career planners the importance of documenting all services, including supportive services, on the IEP/ISS, and in ASSET Manage Services, with the correct fund source.

The WDB should also require that career planners review WIA Policy 13-05 regarding supportive services procedures and documentation.

The WDB should reinforce to career planners the purpose of the IEP, what it should contain, and that it be reviewed every three months per local policy. If the participant is actively engaged in his/her IEP activities and there are no changes since the last version, the career planner can report this via an ASSET case note or make a notation on the IEP in the participant file. The IEP should be updated, and jointly signed and dated if the participant has a significant change in his/her original employment goals and services. If the participant is not engaged or in contact with his/her case manager for longer than 90 days, the participant should be exited.

The WDB must address all errors listed above and make corrections for participants who are still active.

The WDB should also develop or revise policies and procedures to address the above concerns, train its staff and career planners accordingly, and ensure that sufficient oversight occurs on an ongoing basis.

Area of Concern 7: File documentation issues

STANDARD: The DWD Guide to WIOA Title I Eligibility Determination and Documentation, WIOA Title 1B Adult and DW Programs Guide to Participant Case File Documentation, and WIOA Title 1B Youth Program Guide to Participant Case File Documentation provide the appropriate types of documentation that must be included in each participant's file.

Supportive services must be documented in the following way:

The participant file should contain documentation to support the need for assistance. For Transportation Assistance, this should include the route of travel, related cost of travel, training/attendance/job search logs to support the frequency of assistance, and a tracking log of when and how much assistance was provided.

Appropriate Supportive Services should be entered in ASSET with dates relative to when the service was provided.

The Supportive Service must be included in the participant's IEP/ISS.

Each Supportive Service must be documented in ASSET customer notes.

All Supportive Services must comply with WIA Policy 13-05, issued 2/19/2014, and the local supportive services policy.

CONDITION: The following PIN numbers and the assorted issues were identified during the file reviews conducted during the monitoring:

PIN 906822, DW

- Vouchers in file for supportive services (uniform items), but no supporting receipts in the file

PIN 1205142, DW

- IEP signature page in file dated 4/8/2017—the rest of the document is missing
- Comments in the Skills Upgrading & Retraining service do not correspond with vouchers present in the participant file

PIN 1532808, DW

- JSKS and LEAP assessments in file do not include the date of completion
- IEP documented dated 11/17/2014 not signed by participant
- No class schedules or other documentation for Spring 2014 training semester. Voucher #9905 dated 1/7/2014-4/25/2014 for $500 for Spring 2014 Medical Assistant training.
- Voucher #10056 dated 1/27/2014-2/28/2014 for $110 for Medical Assistant required supplies—no receipts or other supporting documentation.
- Voucher #10969 dated 5/5/2014-8/19/2014 for $408.87 for Summer 2014 Medical Assistant training—no class schedule or other supporting documentation.

PIN 1671084, DW

- No vouchers or other documentation to support that participant was in training after Summer 2016. ASSET Services remain open 7/1/2016-8/31/2016 and 9/1/2016-9/7/2016.
- IEP update in file dated 12/27/2015 is not signed

PIN 1899340, DW

- IEP in file dated 1/31/2017 is not signed by participant or case manager

PIN 1901299, DW

- Occupational Classroom service entered in ASSET (using WIODW fund source w/ ITA established), but no evidence in participant file or case notes that participant received any funding for the training.
- Insufficient documentation to justify Planned Gap in Service

PIN 1901393, DW

- IEP update in file dated 3/22/2017 is not signed by participant
- IEP Review service in ASSET dated 9/22/2016—no corresponding document in file

- Other Support Service in ASSET dated 5/5/2016 for Interview Clothing/Shoes—no corresponding voucher in file
- Other Support Service in ASSET dated 5/16/2016 for Steel-toed Boots—no corresponding voucher in file
- Voucher #19451 dated 7/18/2016 for Other Support Service (non-skid shoes)—no receipt or other corresponding documentation
- Other Support Service in ASSET dated 6/16/2016-6/30/2016 for required work clothes for $300 at Kohls—no corresponding voucher in file
- Other Support service in ASSET dated 7/1/2016-8/5/2016 for required work clothes for $300 at Kohls-no corresponding voucher in file

PIN 1682863, Adult

- Credential entered in ASSET Manage Follow-ups Credentials, but no supporting documentation in file

PIN 1539560, Adult

- O*Net assessment in file only includes first name of participant, and does not include a completion date
- Initial assessment does not identify participant by name or PIN
- IEP service in ASSET dated 4/29/2013—document is not in file
- Transportation Assistance provided—no mileage logs or other supporting documentation in participant file

PIN 1743916, Adult

- TABE in file has no name or results

PIN 1884486, Adult

- Voucher #18880 for $75 for clothing at Kohl's in file—no supporting receipt or other documentation

RECOMMENDATION: The WDB should review with career planners the documentation TAGs referenced in the Standard above to determine appropriate documents to include paper files, and ensure ASSET entries are consistent with paper files, and vice versa. Career planners should ensure that forms contained the participant file are filled out completely, and forms requiring signatures/dates should be signed and dated by all required parties. File documentation for Supportive Services must be complete and arranged so it can easily be associated with its corresponding entry in ASSET Manage Services. Supportive Services should be entered separately in ASSET Manage Services instead of being grouped together as one entry over an extended period. Dates in ASSET Manage Services must reflect when the supportive service was provided. It is also recommended that career planners make a notation in the "Comments" box on the ASSET Manage Service screen briefly describing the service and cross-referencing authorization vouchers or Statement of Needs forms found in the participant file.

The WDB should review their local supportive services policy with career planners, and submit a description of how Supportive Services will be better documented. This should include procedures and forms that will ensure Supportive Services are sufficiently accounted for in the future. Once the procedures and form(s) are approved by the Local Program Liaison, the WDB should provide training to appropriate board staff and career planners.

For any active participants, efforts should be made to correct errors listed above, including obtaining or updating forms, and obtaining signatures and dates on forms, as needed. In cases where dates entered in ASSET do not match information contained in the participant file, ASSET should be updated accordingly.

II. POSITIVE PRACTICES

There are two Positive Practices related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-14 Participant Files

POSITIVE PRACTICE 1: Operations Coordinator position and role

Workforce Connections employs a full-time Operations Coordinator, who primarily serves as a Quality Assurance Auditor to review participant files and ASSET records and ensure accuracy. This is reflected in the participant files, which seem to be very well organized.

POSITIVE PRACTICE 2: Income data collection forms, and documented spreadsheet in files.

WWWDB has very strong forms designed to capture appropriate information for eligibility determination. Especially useful are the spreadsheet used to collect and calculate family composition/size and income to determine low-income status; and the Priority of Service determination form.

Western Wisconsin
Workforce Development Board, Inc.

7 Rivers region
On the Upper Mississippi

September 25, 2017

Department of Workforce Development
Employment and Training Division
Bureau of Workforce Training
P.O. Box 7972
Madison, WI 53707-7972

Attention: Phil Koenig

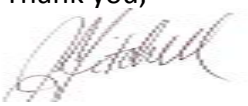
Dear Mr. Koenig,

Thank you for the opportunity to respond to the 2016-17 Coordinated Monitoring Report. We have carefully considered the results contained in the report and have attached our responses to the findings and areas of concern.

Please note that we have identified the need for technical assistance, training and/or clarification on several elements of the report. We look forward to working with DWD to correct the identified issues.

If you have questions or concerns, please don't hesitate to contact me.

Thank you,



Julie Mitchell
Executive Director
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I. FINDINGS

There are three Findings related to fiscal management and one Finding related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-3 PROCUREMENT (FISCAL)

FINDING 1:

- Procurement Must Be Conducted with Full and Open Competition.
    - **STANDARD:** Uniform Guidance 200.319(a) "All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section."
      CONDITION (CAUSE AND EFFECT): WWWDB's policy for the Technical Review of Proposals WWWDB "reserves the right to make selections based solely on the final scores or to take into consideration of other relevant factors". Procurement cannot be full and open if criteria outside of the procurement process are used to make the decision.
      QUESTIONED COST: None
      RECOMMENDATION: The Request for Proposal (RFP) be reissued after the first year of service ensure full and open competition

- Criteria for contract selection must be published in the RFP and used in the selection process. This is a repeat finding.
    - **STANDARD:** Uniform Guidance 200.319(c)(2) **Identify all** requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.
      CONDITION (CAUSE AND EFFECT): WWWDB's policy for the Technical Review of Proposals WWWDB "reserves the right to make selections based solely on the final scores or to take into consideration of other relevant factors". By definition, these relevant factors would have been excluded from the RFP or their consideration would have occurred during the rating process.
      QUESTIONED COST: None
      RECOMMENDATION: The contract for Youth not be renewed and a new RFP be issued after one year to ensure full and open competition.

- WWWDB did not document how the responsible firm constitutes the most advantageous to the program.

    - **STANDARD:** Uniform Guidance 200.318(a)(7) "Contracts must be awarded to the responsible firm **whose proposal is most advantageous to the program."**

WWWDB RESPONSE:

The WWWDB will remove all policy language that refers to making selections based upon anything other than scores. The criteria for contract selection will be clearly outlined in future RFPs and all contracts will be selected based solely on scores that are aligned with the criteria established. The most advantageous program will be documented based upon scoring. Updated policies will be completed and approved by the Board by February 1, 2018. Updated policies will be sent to DWD upon Board approval. The Coordinated Monitoring Report was not received until PY17 had already started and current providers already had letters authorizing expenditures, therefore the Youth contract was renewed for PY17. New RFPs will be issued for all services for PY18.

A-6 WRITTEN FISCAL AND PERSONNEL POLICIES

FINDING 2:

- Required Conflict of Interest Policy is Not Established.
    - **STANDARD:** Uniform Guidance 200.318 (c) (1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest."
      CONDITION (CAUSE AND EFFECT): The WWWDB Personnel Policies allows an employee to have an interest in a contract paid by WWWDB if the contract was competitively bid. Uniform Guidance specifically prohibits an employee, officer, or agent from participating in the selection, award, or administration of a contract.
      QUESTIONED COST: None
      REQUIRED ACTION: WWWDB is required to update its Personnel Policy to reflect current regulations.

- Required Allowability Policy is Not Established. This was an Area of Concern in 2015-2016.
    - **STANDARD:** Uniform Guidance 200.302 (b) (7) "The financial management system of each non-Federal entity must provide for the following: Written procedures for determining the allowability of costs. . ."
      CONDITION (CAUSE AND EFFECT): The WWWDB Financial Policies and Procedures Manual references "WIOA Policies and Procedures Manual" for criteria on Allowability. This Manual has never existed.
      QUESTIONED COST: None
      REQUIRED ACTION: WWWDB is required to update its policy to reflect current regulations.

- Required Record Retention Policy is Not Established. This was an Area of Concern in 2015-2016.
    - **STANDARD:** Uniform Guidance 200.333 "Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years." WIA Policy Update 07-05 - A program participant files must be retained for seven consecutive years after the participant exists from US DOL funded programs.
      CONDITION (CAUSE AND EFFECT): The WWWDB Financial Policies and Procedures Manual states the record retention policy for the sub-award but does not include record retention policy for the WWWDB. The WWWDB Financial Policies and Procedures Manual requires the sub-award to retain records for three years. DWD WIA Policy Update 07-05 requires a seven-year retention period for participant files.
      QUESTIONED COST: None
      REQUIRED ACTION: WWWDB is required to update its policy to reflect the circumstances and requirements for both the three-year and the seven-year record retention requirement.

WWWDB RESPONSE:
The WWWDB will update Personnel Policies to reflect compliance with Uniform Guidance regarding conflict of interest. Updated policies will be drafted and approved by February 1, 2018. Updated policies will be sent to DWD upon Board approval.

The WWWDB will draft a procedures document on determination of allowability of costs to include in the Financial Policies and Procedures Manual. The allowability procedures document will be drafted and approved by February 1, 2018. Updated policies/procedures will be sent to DWD upon Board approval.

The WWWDB will update the Financial Policies and Procedures Manual to include both the 3 year subcontractor record retention and 7 year WWWDB record retention period for participant files. Updated policies will be drafted and approved by February 1, 2018 and sent to DWD upon Board approval.

A-11 FISCAL REPORTING

FINDING 3: Unliquidated Obligations are not being reported on the Financial Status Reports (FSR).

STANDARD: UG 200.331(d)(1) Requirements Pass-through and UG 200.302(b)(3) Financial Management.

CONDITION: WDB has not been reporting obligations with service providers on their FSRs.

QUESTIONED COST: None

REQUIRED ACTION: Any Obligations must be reported on the FSR's monthly.

WWWDB RESPONSE:
The WWWDB will work with fiscal agent to ensure obligations are reported on the monthly FSR. Technical assistance may be necessary.

A-16 ELIGIBILITY AND SERVICES

FINDING 4: DW eligibility documentation issue

STANDARD: DW eligibility must comply with WIOA Federal Regulations, 20 CFR 680.120 – 680.130 0 and the WIOA Title 1 Eligibility Determination and Documentation Technical Assistance Guide (TAG), pages 9-10. In order to receive services in the DW Program, individuals must:

1. Meet general eligibility criteria;

2. Meet the Federal definition of "DW" at WIOA Sec 3(15); and
3. Meet all three State eligibility criteria.

Appropriate documentation related to eligibility must be retained in the participant file, and applicable data entered into Automated System Support for Employment and Training (ASSET). Eligibility requirements must clearly, and without question, be satisfied and documented prior to the provision of any Individualized, Training, or Supportive services, and especially before obligating or vouchering any funds for the individual.

Failure to meet eligibility requirements could result in disallowed costs.

CONDITION: The following files contained eligibility problems**:**

PIN 1876046: Participation date is 02/16/2016, but according to case note #4465763 dated 3/17/2016: Career Planner requested Unemployment Insurance (UI) documentation and DD-214. Despite this case note:

- There is no additional case note indicating when those documents were received.
- Documents are present in file, but are not date stamped.
- UI Documentation in file has a "mailed date" of 02/25/2016 – after the participation date.
- Selective Service documentation in the file is dated 04/16/2016 – after the participation date.

The participant received Career, Staff Assisted, Individualized and Supportive services prior to the completion of the eligibility determination. This includes issuance of two vouchers (#17783 dated 3/19/2016 – 6/1/2016 for CMQ/OE Certification preparation in the amount of $1038) and (#17782 dated 3/19/2016 for transportation assistance in the amount of $180).

PIN 630814: There is inadequate documentation of "unlikely to return to a previous industry or occupation".

PIN 1532808: DW Federal Criterion #1.a was selected, but the participant file does not contain UI documentation.

QUESTIONED COSTS: All direct costs (training, supportive services) spent on ineligible participants must be reimbursed by the board to the WIOA Program with non-federal funds.

REQUIRED ACTIONS: PIN 1876046—WWWDB must provide clear documentation to prove the eligibility criteria were met prior to any direct cost expenditures. If no documentation can be produced, the Board must provide an itemized list of all direct costs spent on the participant.

WWWDB RESPONSE:

Many of the items pointed out in this monitoring are items that have been the result of standard operating procedures that have not been issues in previous monitoring visits. Due to the level of detail involved in this monitoring, there will be a lot of requests for technical assistance.

Additionally, service providers will participate in all future monitoring visits to answer questions or explain processes. After conferring with WCI, the following response is offered:

Enrollment for PIN 1876046 occurred on 2/16/16 following the customer participating in an informational session for a local dislocation. During enrollment participant identified as a Veteran and DD214 was requested as supporting documentation. Evidence of services and contacts with OVS also present in ASSET substantiating the Veteran status. Staff accepted participant self-attestation to selective service requirements based on military record and efforts to obtain the DD-214 as sufficient documentation for establishing selective service requirements based on Policy Update 11-02 referenced in the WIA Policy manual for Selective Service Registrants that allows the DD-214 to suffice as allowable documentation.

Selective service documentation requested to be saved to the file on 3/17 through internal Edit check and staff verified DD214 form saved on 3/22. Participant was a Veteran and in the process
of submitting the DD214 to Staff to which Staff thought that implied the same as meeting the selective service requirements based on WIA policy still in effect. The clarification of the process to Staff took place on April 6th which resulted in the print out of the selective service screen being
printed and placed in the file as noted to support participant attestation of meeting this requirement. These communications are attached.

Vouchers were written on 3/16/2016 but not sent to fiscal until 4/7 and 4/8 at which point they had the internal approval for funding. Internal process for vouchers allows for vouchers to be written, they are then sent to the Operations Coordinator for review, and then sent to fiscal when verified they are allowed and approved. The funding approval for both vouchers was processed after the point of verifying and gathering all eligibility documentation. Emails for approval are attached for reference.

Based on the Policy Manual in effect at the point of enrollment all eligibility documentation was present in the file by 3/22/2016 after which vouchers were approved.

UI documentation was requested as documented in file and indicated at enrollment as participant
was not currently receiving the benefit but had applied following dislocation. As indicated the participant was a part of an Informational Session and had received notice of layoff and was identified on the layoff list from the employer.

Based on the policies and plans in place at the time of enrollment, the WWWDB feels eligibility was adequately established prior to any expenditures. **Please provide technical assistance to the WWWDB** on the distinction of eligible for UI versus receiving UI and the implications for DW eligibility and documentation.

Regarding PIN 630814, DW eligibility documentation form in file states “Unable to find a job in their previous Occupation” based on Staff assessment. Local plan for PY 13 allowed

assessment of the individual skill compared to the current occupation skill requirement. Case notes will be strengthened to support the staff assessment, but the WWWDB feels staff assessment of participant skills vs. required occupational skills should be sufficient. **Please provide technical assistance** regarding what documentation is necessary to adequately document "unlikely to return to a previous industry or occupation".

PIN 1532808—WWWDB must provide UI documentation to provide the eligibility criterion was met, or provide proof that the participant meets another DW Federal Criterion. The participant file does show indications that there could be eligibility under Federal Criterion #2. Corrective action for this case would be to either provide the UI documentation, or properly identify the eligibility under criterion two, and submit the ASSET staff request to change the Federal Criterion.

Once this information is provided, Division of Employment and Training (DET) will instruct WWWDB on when and how to reimburse any disallowed costs.

WWWDB RESPONSE:

WWWDB will have WCI staff submit a change request to change to federal criterion #2 as the file documentation indicates. Additionally, WCI has implemented and issued guidance to require all eligibility documentation to be date stamped with subsequent case notes stating specific receipt of the documentation. WCI has established forms and processes to verify eligibility as well as a standing monitoring process at enrollment referred to as Edit Check. The Edit Check process has been updated to add verification of date stamps to ensure compliance. WCI WIOA program funding guidelines also clearly state that no funding is to be spent on a participant prior to enrollment. Continued and ongoing education to staff will occur to ensure adherence to this process.

RECOMMENDATIONS: Career Planners should ensure that all required documents are received and validated prior to completing enrollment in ASSET. Career Planners should also ensure that information gathered from the individual's signed application accurately reflects the information that is entered into ASSET. Documents received by career planners, especially those related to eligibility, should be date stamped at the time of receipt, and corresponding case notes should be entered in ASSET.

II. AREAS OF CONCERN

There are three Areas of Concern related to fiscal management and four Areas of Concern related to the program administration of the WIA/WIOA Youth, Adult, and DW programs.

A-3 PROCUREMENT

AREA OF CONCERN 1: Conditions for noncompetitive proposals.

STANDARD: Uniform Guidance 200.320(f)

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

(1) The item is available only from a single source;
(2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
(3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
(4) After solicitation of a number of sources, competition is determined inadequate.

CONDITION: (CAUSE AND EFFECT):
There are four conditions under which a non-competitive proposal can be used. WWWDB has added two more conditions which are not authorized.

QUESTIONED COST: None.

RECOMMENDATION: WWWDB is required to eliminate the two unauthorized conditions for a non-competitive proposal.

WWWDB RESPONSE:
The WWWDB will update the Procurement Policies to remove unauthorized conditions for issuing a non-competitive proposal. Updated policies will be approved by Board by February 1, 2018 and sent to DWD upon Board approval.

AREA OF CONCERN 2: Consideration of special populations.

STANDARD: Uniform Guidance 200.321(a)
The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

CONDITION: (CAUSE AND EFFECT):
WWWDB's Financial Policy and Procedures Manual considers small and minority-owned businesses in purchasing decisions, thereby excluding by omission women's business enterprises, and labor surplus area firms which may cause difficulties in the future.

QUESTIONED COST: None.
RECOMMENDATION: WWWDB is required to include women's business enterprises and labor surplus area firms to their Financial Policy and Procedures Manual.

WWWDB RESPONSE:
The WWWDB will revise the Financial Policy and Procedures Manual to include women's business enterprises and labor surplus area firms in purchasing decisions. Updated policies will be approved by Board by February 1, 2018 and sent to DWD upon Board approval.

A-11 FISCAL REPORTING

AREA OF CONCERN 3: Leveraged resources are not being reported on the FSR's.
STANDARD: UG 200.331(d)(1) Requirements Pass-through and UG 200.302(b)(3) Financial Management.

CONDITION: WDB's are required to report any leveraged resources. Leveraged funds are all resources used to support the WIOA Title 1 Grant activities and desired outcomes.

RECOMMENDATION: WDB must work with their service providers to compile and report the leveraged resources on all WIOA TITLE 1 Grants.

WWWDB RESPONSE:
The WWWDB will give technical assistance to service providers regarding reporting of leverage and will ensure leverage is reported as required on the FSRs. The WWWDB is requesting technical assistance regarding whether leverage needs to be reported monthly or if it can be reported quarterly.

A-14 PARTICIPANT FILES

AREA OF CONCERN 4: Low income determination and documentation problems

STANDARD: Low Income Determination must be completed per WIOA Section 3(36)(A)(ii)(II), and 3(36)(B), as well as WIOA Final Rules Section 681.280. WIOA Title I programs have two uses for income determinations: First, is the eligibility for the Youth/Young Adult program, where the information is a part of the in-school and out-of-school eligibility criteria. The second is to determine priority of service for the Adult Program.

WWWDB RESPONSE:
The WWWDB will ensure Career Planners have the necessary understanding of definitions for determining family size and countable income. The WWWDB will work with service providers to establish a checklist of items that will be used in training Career Planners. Some of the issues pointed out in the monitoring report were not fully understood by the WWWDB or its providers. To help clarify each issue, the WWWDB requested Workforce Connections, Inc. (WCI) to provide an explanation for each issue identified in the report. Please see Attachment A for this explanation from WCI in response to the monitoring report programmatic issues.

AREA OF CONCERN 5: ASSET Reporting Errors

STANDARD: ASSET is used to track data for customers receiving services under the WIOA programs. The accuracy and completeness of data is critical for accurate federal reporting, resource planning, monitoring/evaluation, and state and local program management. WDBs

should ensure that ASSET reporting complies with WIOA policies, the ASSET User's Manual, and local WDB policies.

The Federal DOL requires all states to complete annual data validation to verify that randomly selected demographic, performance, and service-related data is accurate and agrees with documents contained in the corresponding participant file and ASSET case notes. It is especially crucial that data fields directly impacting performance outcomes and/or the Statistical Adjustment Model be completed accurately. ASSET Manage Services must show accurate actual open and close dates for services provided to participants. Annual data validation requires some services to be an exact date match (e.g. first day of staff-assisted service, training start and end dates, etc.) WIA Policy 13-05, issued 2/19/2014, indicates that other services should be relative to when the service started and ended (e.g. supportive services, incentives, job search, etc.). Acceptable data validation sources can be found in the Eligibility TAG, WIA Policy Manual, and Training and Employment Guidance Letter (TEGL) 22-15. A complete list of services directly impacting performance and/or affecting the Statistical Adjustment Model can be found in the Performance TAG.

WIA Policy 06-07, issued 6/29/2006, states that qualifying certificates/credentials must be reported in ASSET Manage Follow-Ups and documentation validating certificate/credential attainment should be placed in the participant file. Reporting credentials in ASSET is crucial since credential attainment is a performance indicator under WIOA.

In general, information entered in ASSET should correspond directly with documentation contained in the participant file, and information entered in case notes, and vice versa.

WWWDB RESPONSE:

The WWWDB will correct all issues identified in this section. An ASSET procedures manual and common error list will be created and used to train Career Planners. The WWWDB is unclear as to the exact nature of some of the cited issues. There are some instances where documentation is present, but the report indicates it is not, so clarification is sought regarding these instances. The WWWDB requested Workforce Connections, Inc. (WCI) to provide an explanation for each issue identified in the report. Please see Attachment A for this explanation from WCI in response to the monitoring report programmatic issues. The WWWDB seeks technical assistance on vouchering processes, as the current A/DW provider has fiscal systems and vouchering processes that have been in place for many years and have not previously been an issue. Additionally, as indicated in Attachment A, some issues may have been the result of the WWWDB not issuing a separate grant for RR Transition, but having WCI enroll all DW participants in Transition until it was expended. This may have caused tracking problems at the service provision level.

AREA OF CONCERN 6: Case Management Issues

STANDARD: A participant's success comes from within but also depends on effective case management built on a solid foundation of comprehensive qualitative and quantitative assessments and development of strong IEPs for Adult and DW participants, and Individual

Service Strategies (ISS) for Youth participants. One way to measure case management practices during monitoring is to look at the quality and frequency of IEP and ISS documents, frequency of career planner contact with the participant, and the quality and frequency of ASSET case notes. In the absence of strong assessment and IEP/ISS development processes, quality documentation of those processes, and regular participant contact, individual outcomes as well as local and state performance outcomes can suffer.Per the WIA Policy Manual, the IEP/ISS is an ongoing strategy jointly developed, signed and dated by the participant and the case manager. The IEP/ISS documents and describes the participant's employment goals, achievement objectives, determination of need for training, and the appropriate combination of services for the participant to achieve the objectives. IEPs/ISSs should be reviewed periodically and updated as needed (a minimum of every six months is recommended).

The WDB's Local Plan VI.C.9 indicates that contact with active participants will occur at minimum, every three months. The contact must be documented in case file/notes and ideally signed by case manager and participant. If no signature, reason why not must be documented in case notes.

The WDB's Local Plan VI.H.13. indicates that youth program participants are required to be reviewed/updated at minimum, every three months. This must be documented in case file/notes and ideally signed by case manager and participant. If no signature, then a reason why it is not signed must be documented in case notes.

Both the WDB Local Plan and DWD require that all contacts are documented in ASSET case notes.

WDBs must ensure that case management and ASSET entry comply with federal, state, and local policies. DET expects to see the following practices in place when conducting participant file and ASSET review:

Case notes must be complete; align with ASSET Manage Services, participant file documentation, and that participant's employment plan; and are updated in accordance with the WDB's Local Plan.

IEP and ISS documents must be aligned with ASSET Manage Services, participant file documentation, and ASSET case notes; be signed and dated by the participant and case manager; and be updated in accordance with the WDB's Local Plan. Priority of Service must be provided in accordance with federal, state, and local policy. Per Administrators Memo 16-06 dated July 22, 2016, "all participants enrolling in the Adult Program, who are not low income or public assistance recipients, must complete the screener DETW-18156-E to determine if an individual is basic skill deficient."

Non-Traditional Occupations (NTO) must be discussed with all participants. WIOA Federal Regulation 682.200(b)(1) states that one of the required statewide employment and training

activities includes providing information about the State list of eligible training providers (including those providing non-traditional training services). Furthermore, ASSET Manage Programs/Title 1 contains two data fields pertaining to NTO; one asks if it was discussed with the participant and the other asks if the participant was interested. Case managers are expected to complete both data fields.

When a participant is served by multiple funding sources, coordination between program case managers is required to maximize services with available funds. WIOA Federal Regulation 680.230(a)(1) states that WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the costs of their training. And 680.230(b) places responsibility on the one-stop center to coordinate available training funds. 680.330(e) allows for coordination of ITA funding with funding from other programs.

Participants should be informed at enrollment of how often and under what conditions they are required to contact their career planner. WDBs should have policies and procedures in place to routinely monitor that all participants are engaged in their services, are staying in contact with their career planner, and that ASSET Manage Service dates are not artificially extended. Cases of lost contact or disengagement in services should result in exit according to the local policies and procedures.

WWWDB RESPONSE:

The WWWDB will develop mandatory IEP/ISS training to be used in conjunction with ASSET and eligibility training for Career Planners. This training will include all required elements as noted in the monitoring report. The WWWDB will also increase the frequency and depth of monitoring activities to ensure compliance. The WWWDB changed its policy on the frequency of IEP updates from 3 months to 6 months.

Additionally, the WWWDB is unclear as to the exact nature of some of the cited issues. There are instances where it is stated by DWD that activities are not adequately case noted, but several case notes are present. There was mention of poor coordination with TAA, when there is documentation of very good coordination. Please see Attachment A for details on these instances. Technical assistance is requested to clarify these instances and clarify what DWD means by the phrase, “Follow-ups are not documented in Manage Follow-ups Follow-Up status”. All errors that are currently understood will be corrected. Those in question will be corrected if they still need to be after technical assistance is given.

Area of Concern 7: File documentation issues

STANDARD: The DWD Guide to WIOA Title I Eligibility Determination and Documentation, WIOA Title 1B Adult and DW Programs Guide to Participant Case File Documentation, and WIOA Title 1B Youth Program Guide to Participant Case File Documentation provide the appropriate types of documentation that must be included in each participant's file.

Supportive services must be documented in the following way:

The participant file should contain documentation to support the need for assistance. For Transportation Assistance, this should include the route of travel, related cost of travel, training/attendance/job search logs to support the frequency of assistance, and a tracking log of when and how much assistance was provided.

Appropriate Supportive Services should be entered in ASSET with dates relative to when the service was provided.

The Supportive Service must be included in the participant's IEP/ISS.

Each Supportive Service must be documented in ASSET customer Notes.

All Supportive Services must comply with WIA Policy 13-05, issued 2/19/2014, and the local supportive services policy.

WDB RESPONSE:

The service provider (WCI) has never kept receipts in files; they are kept in fiscal files. In previous monitoring visits, they were asked to provide fiscal documents in support of purchases at the time of the monitoring. Since this has not been an issue previously, the WWWDB has not required the service provider to keep receipts in the participant files. This is further explained in Attachment A. Additionally, service providers will participate in future monitoring visits in an effort to answer questions or resolve issues prior to becoming a finding or area of concern.

Dissemination and ASSET entry of support services will be included in the comprehensive training that will be developed for Career Planners. This part of the training will include the requirement for separate entry of support services, local policies, and the other elements noted in the report. The local policies will be reviewed and the WWWDB will submit a description of how support services will be better documented, including procedures and verification forms. These will be submitted to DWD by January 1, 2018 and will be used in the comprehensive training for Career Planners and WWWDB staff. Full training should be developed and completed by March 1, 2018.

WorkforceConnections
Your connection to work and training.

September 8, 2017

Julie Mitchell, Executive Director
Western Wisconsin Workforce Development Board
2615 East Avenue South, Suite 101
La Crosse, WI 54601

Dear Ms. Mitchell:

Workforce Connections, Inc. (WCI) has received and reviewed the results of the Department of Workforce Development's (DWD) 2016-2017 WIOA Coordinated Monitoring Report. At the request of the Workforce Development Board and DWD, WCI has reviewed all areas regarding service provision included in the report and coordinated responses and actions.

The subsequent pages of this report outline the Finding and Areas of Concern noted and WCI's agreements, actions, and requests for clarity and technical assistance as necessary.

Thank you for the opportunity to respond to this request and seek clarity where needed. WCI appreciates the feedback and continued efforts to ensure that our WIOA program is run with efficiency and effectiveness.

Sincerely,

Kelly Norsten, Programs Manager
Workforce Connections, Inc.

Enc: Monitoring Response
Attachment A- Supporting Documentation

FINDING 4: DW eligibility documentation issue

PIN 1876046:

- **Participation date is 02/16/2016, but according to case note #4465763 dated 3/17/2016: Career Planner requested Unemployment Insurance (UI) documentation and DD-214. Despite this case note:**
  - **There is no additional case note indicating when those documents were received.**
  - **Documents are present in file, but are not date stamped.**
  - **UI Documentation in file has a "mailed date" of 02/25/2016 – after the participation date.**
  - **Selective Service documentation in the file is dated 04/16/2016 – after the participation date.**
- **The participant received Career, Staff Assisted, Individualized and Supportive services prior to the completion of the eligibility determination. This includes issuance of two vouchers (#17783 dated 3/19/2016 – 6/1/2016 for CMQ/OE Certification preparation in the amount of $1038) and (#17782 dated 3/19/2016 for transportation assistance in the amount of $180).**

WCI Response: Enrollment occurred on 2/16/16 following the customer participating in an informational session for a local dislocation. During enrollment participant identified as a Veteran and DD214 was requested as supporting documentation. Evidence of services and contacts with OVS also present in ASSET substantiating the Veteran status. Staff accepted participant self-attestation to selective service requirements based on military record and efforts to obtain the DD-214 as sufficient documentation for establishing selective service requirements based on Policy Update 11-02 referenced in the WIA Policy manual for Selective Service Registrants that allows the DD-214 to suffice as allowable documentation.

Selective service documentation requested to be saved to the file on 3/17 through internal Edit check and staff verified DD214 form saved on 3/22. Participant was a Veteran and in the process of submitting the DD214 to Staff to which Staff thought that implied the same as meeting the selective service requirements based on WIA policy still in effect. The clarification of the process to Staff took place on April 6th which resulted in the print out of the selective service screen being printed and placed in the file as noted to support participant attestation of meeting this requirement. These communications are attached.

Vouchers were written on 3/16/2016 but not sent to fiscal until 4/7 and 4/8 at which point they had the internal approval for funding. Internal process for vouchers allows for vouchers to be written, they are then sent to the Operations Coordinator for review, and then sent to fiscal when verified they are allowed and approved. The funding approval for both vouchers was processed after the point of verifying and gathering all eligibility documentation. Emails for approval are attached for reference.

Based on the Policy Manual in effect at the point of enrollment all eligibility documentation was present in the file by 3/22/2016 after which vouchers were approved.

UI documentation was requested as documented in file and indicated at enrollment as participant was not currently receiving the benefit but had applied following dislocation. As indicated the participant was a part of an Informational Session and had received notice of layoff and was identified on the layoff list from the employer. **Please provide technical assistance** on the distinction of eligible for UI versus receiving UI and the implications for DW eligibility and documentation.

WCI feels that substantial documentation is in place to prove eligibility was established prior to the expenditure of funds. Please advise if additional documentation is required.

PIN 630814, DW

- **There is inadequate documentation of "unlikely to return to a previous industry or occupation".**

WCI Response: DW eligibility documentation form in file states "Unable to find a job in their previous Occupation" based on Staff assessment. Local plan for PY 13 allowed assessment of the individual skill compared to the current occupation requirement. WCI will strength the supporting case notes and documentation to this assessment and educate staff through monthly staff meetings and electronic communications. **Please clarify the issue.**

PIN 1532808, DW

- **DW Federal Criterion #1.a was selected, but the participant file does not contain UI documentation.**

WCI Response: No contest. Staff request submitted to change to federal criteria #2 as documentation in the file supports.

WCI has implemented and issued guidance to require all eligibility documentation to be date stamped with subsequent case notes stating specific receipt of the documentation. WCI has established forms and processes to verify eligibility as well as a standing monitoring process at enrollment referred to as Edit Check. The Edit Check process has been updated to add verification of date stamps to ensure compliance. WCI WIOA program funding guidelines also clearly state that no funding is to be spent on a participant prior to enrollment. Continued and ongoing education to staff will occur to ensure adherence to this process.

AREA OF CONCERN 4: Low income determination and documentation problems

PIN 1532808, DW

- **Income in participant file is not calculated for the past six months or annualized**

WCI Response: The requirement of calculating income for dislocated workers to determine low income did not go into effect until November 2013 (see Job Center Systems Technical Bulletin dated 11/14/2013), after this participant was enrolled. Previous 6 Months Spreadsheet has been created, based on file documentation, to determine whether or not individual is Low Income. Spreadsheet has determined that individual is NOT low income, and copy has been placed in the file. **Please clarify the issue.**

PIN 1671084, DW

- **Family composition of three includes participant's mother, who does not meet the WIOA definition of family, and includes the mother's social security income. Family size should be two, to include the participant and her son. Participant's income for last six months is $6543.83, annualized=$13087.66—for a family of two, this income would fall below 70% of Lower Living Standard Income Level (LLSIL), which makes the ASSET entry incorrect.**

WCI Response: No contest. Clarification taken and ASSET and participant file updated to reflect this.

PIN 140284, Adult

- **Family size of two includes grandfather, who does not meet the WIOA definition of family. Family size should = one.**
- **Grandfather's income (railroad pension) is used incorrectly in income calculation, which put the participant over Federal Poverty Level (FPL)/LLSIL.**
- **Participant receives a Trust Fund, but Trust Fund income was not clearly documented or used in income calculation.**
- **ASSET entry regarding income could be incorrect based on inaccurate determination of family size and use of non-family-member's income.**

WCI Response: No contest. Family size is updated to one and previous 6-month income form in file updated as well as corresponding ASSET screen.

AREA OF CONCERN 5: ASSET Reporting Errors

PIN 1876046, DW

- **Individual Employment Plan (IEP) in file created and signed 2/16/2016; date does not match ASSET service date 2/23/2016**

WCI Response: No contest, guidance provided to staff to ensure service dates match actual dates.

- **IEP in file dated 3/22/2016 does not have corresponding ASSET service.**

WCI Response: No contest, guidance provided to staff to ensure service dates match actual dates.

- **IEP in file dated 4/25/2016; date does not match ASSET service date 4/26/2016**

WCI Response: No contest, guidance provided to staff to ensure service dates match actual dates.

- **Voucher #17783 dated 3/16/2016-6/1/2016; dates do not match ASSET service dates**

WCI Response: No contest, guidance provided to staff to ensure service dates match actual dates. Voucher dates represent the period that a voucher may be given to a vendor and do not coordinate with exact service dates to ensure the allowance of vendor participant interaction. Voucher processes will be updated to include the start date on the voucher to coincide with service start date. Fiscal system and processes do not allow for voucher end dates to match service end date without causing significant administrative work. **Please provide technical assistance.**

PIN 1205142, DW

- **IEP signature page present in file dated 4/8/2017; no corresponding service in ASSET**

WCI Response: No contest, staff guidance provided. Service screen added in ASSET.

- **Voucher #17234 in participant file for training; no corresponding service in ASSET**

WCI Response: Participant's CNA training was a part of the longer term LPN training. There is a Skills Upgrading and Retraining screen that includes the dates of the CNA training. **Please clarify the issue.**

- **Occupational Classroom in ASSET dated 9/30/2016; no details in case notes or participant file to support the training**

WCI Response: No contest, staff guidance provided. Training provided was a TAA training as per TAA case notes. Service dates have been updated in ASSET and documentation has been requested and received for WIOA file from TAA.

- **Summer training is mentioned in case notes; but no corresponding service in ASSET**

WCI Response: No contest, staff guidance provided of expectation to ensure case notes and service screens coincide. Service screen has been added in ASSET.

PIN 1532808, DW

- **Job Search Knowledge Scale (JSKS) and Liberal Education and America's Promise (LEAP) assessments present in file; no corresponding Assessment-Comprehensive & Specialized service(s) in ASSET.**

WCI Response: No contest, staff guidance and standard is that assessments are documented in case notes and services.

- **Certified Nursing Assistant (CNA) License dated 6/20/2014 was entered in ASSET Manage Follow-ups Credentials as an Occupational Certificate (wrong category)**

WCI Response: Guidance being sought on the distinction between credentials in ASSET versus Occupational Certificates. **Please provide technical assistance**.

- **CNA Certification present in file dated 12/17/2013 was not entered in ASSET Manage Follow-ups Credentials**

WCI Response: No contest, clarification taken and updated in ASSET.

- **IEP in file dated 5/13/2013; no corresponding service in ASSET**

WCI Response: No contest. Provider procedure on entering service screens every time we update an IEP was implemented on 10/21/2014, prior to that staff were not operating under this practice. The file has exited and as such services not updated, please advise if action needs to occur.

- **CNA training dates documented in the participant file (9/3/2013-12/17/2013) do not match ASSET service dates (8/23/2013-12/18/2013).**

WCI Response: Per class schedule in file, General Anatomy & Physiology started 8/29/2013, which is the date reported in ASSET. **Please clarify the issue.**

- **Voucher #10794 dated 4/21/2014-5/21/2014 for $70 for CNA exam; no corresponding service in ASSET**

WCI Response: No contest, Staff guidance provided.

- **Voucher #12528 dated 12/11/2014-12/14/2014 for $68 for Transportation Assistance; no corresponding service in ASSET**

WCI Response: There is a service in ASSET dated 12/4/2014 - 12/4/2014. **Please clarify the issue**.

- **Voucher #15754 dated 10/21/2015-11/13/2015 for $200 for scrubs/attire; no corresponding service in ASSET**

WCI Response: This voucher was for follow-up, as such the service screen is in Manage Follow-ups. **Please clarify the issue.**

- **Other Support Service in ASSET dated 1/12/2015-2/28/2015 comments show for mileage—should be entered as Transportation Assistance**

  WCI Response: No contest, Staff guidance has been provided to ensure more specific selection of services. File has exited please advise if additional action needs to occur.

PIN 1850081, DW

- **Rapid Response Grant fields in ASSET Manage Programs not completed appropriately**

  WCI Response: ASSET was updated based on WDB direction and clarification to only open and close the fund source. These updates were made following the close process and included limited updates per direction received. **Please provide technical assistance.**

PIN 1671084, DW

- **Planned Gaps in Service entered in ASSET dated 9/7/2016-12/12/2016, and 12/13/2016-Present—it is unclear why the Planned Gap was closed on 12/12/2016 and reopened the next day, instead of continuing as one service.**

  WCI Response: Direction received via email from Peter Schmitz to close all Planned Gap in Service screens. When further guidance not received following several requests to the WDB and DWD, the service was opened back up. **Please provide technical assistance.**

- **Credential date in ASSET Manage Follow-ups credential (12/18/2015) does not match date of certification in file (12/17/2015)**

  WCI Response: No contest, Staff request submitted to change the date in ASSET to correlate with the certification in the file.

- **Credential in file for Western Technical College Frontline Services dated 8/19/2015 not entered in ASSET Manage Follow-ups Credential.**

  WCI Response: No contest, credential has been added to ASSET.

- **IEP in file dated 12/18/2015; ASSET service dates (12/15/2015-12/28/2015) do not correspond.**

  WCI Response: IEP update process was started 12/15/2015 per case note. Service date correlates to this. IEP signature was then obtained on 12/18/15 as indicated in the file. In other instances of this monitoring it is a cited issue of service dates to have the IEP service start on a date prior to obtaining signature despite communications to update the IEP prior to signature obtainment date. These seem to be conflicting messages. **Please clarify the issue** and **please provide technical assistance.**

- **IEP in file dated 7/18/2016 and signed 8/1/2016; ASSET service dated 8/2/2016 does not correspond.**

  WCI Response: No Contest, service dates in ASSET have been updated accordingly.

- **In training already at time of intake—should have Occupational Classroom service open dated 6/29/2015-8/22/2015 with Other Non-WIOA fund source to reflect accurate activities.**

WCI Response: No contest, service entered accordingly.

PIN 1899340, DW

- **Rapid Response Grant (RRG) fields in ASSET Manage Programs not completed accurately**

  WCI Response: Service opened under WDB directive to change a service fund sources for enrollment into the transition grant, but nothing else. **Please provide technical assistance.**

- **Three separate services in ASSET for Housing Assistance—two of the services include reference to the same voucher #, one using the WIODW fund source and the other using the RRG fund source**

  WCI Response: These were opened to be in alignment in request with WDB process for transition grant. Request to remove ones dated 7/1/16 to 8/31/16 and 9/1/16 to 12/31/16 and 1/1/17 to 4/19/17. **Please provide technical assistance.**

PIN 1901393, DW

- **RRG fields not completed accurately in Manage Programs**

  WCI Response: WDB directed us to change a service fund sources for the Transition Grant, but nothing else. **Please provide technical assistance.**

- **Voucher #18547 dated 5/5/2016-5/13/2016 for $100 for Transportation Assistance; ASSET service dates (5/1/2016-5/31/2016) do not match voucher dates.**

  WCI Response: Voucher 18547 dated (5/5/2016 - 5/13/2016) was for clothing, not transportation. ASSET service (Other Support Service Assistance) dates (5/5/2016 - 5/5/2016). Begin dates match, but end dates do not based on vouchering process and fiscal systems. Need clarification on what to use for an end date to work with current fiscal systems and process to allow time for vouchers to be given to vendors and subsequent invoicing without administratively heavy processes. **Please provide technical assistance.**

- **Multiple transportation vouchers present in file but only one service entered in ASSET**
  - **Voucher #18547, $100, 5/5/2016-5/13/2016**

    WCI Response: Voucher was for Clothing and Shoes – Other Support Service Assistance 5/5/2016 – 5/5/2016 and is present in file. This voucher is not for transportation. **Please clarify.**

  - **Voucher #18637, $500, 5/1/2016-5/31/2016**

    WCI Response: This voucher is for Mileage – Transportation Assistance 5/1/2016 – 5/31/2016.

  - **Voucher #18661, $200, 5/16/2016-5/27/2016**

    WCI Response: Voucher is for Boots - Other Support Service Assistance 5/16/2016 – 5/16/2016 and present in file. This voucher is not for transportation. **Please clarify.**

A new standard will be implemented and in place by October 1st in which staff will open separate services for each voucher that is issued for transportation and like support services. Voucher dates will have the start date to correlate with beginning service dates.

PIN 1682863, Adult

- **IEP in file dated 12/1/2014; no corresponding service in ASSET.**

WCI Response: No contest, participant has exited please advise if any further action needs to take place.

- **IEP in file dated 8/27/2015, ASSET service date 9/1/2015 does not match**

WCI Response: IEP was printed 8/27/2015 and signed on 9/1/2015. Service screen starts and ends 9/1/2015 correlating with the signature date. In other instances of this monitoring it is a cited issue of service dates to have the IEP service start on a date prior to obtaining signature despite communications to update the IEP prior to signature obtainment date. These seem to be conflicting messages. **Please provide technical assistance.**

PIN 340265, Adult

- **Skills Upgrading & Retraining service in ASSET dated 4/20/2015-6/30/2015 has "Other" fund source, but has an established Individual Training Account (ITA)**

WCI Response: This service was not funded by WIOA but did have an established ITA. Current practice is to enter the ITA information and as much detail and documentation surrounding the training as WIOA provides support to the participant even though they are not funding the actual training as dollars are being leveraged through other resources to do so. Clarity being sought on documentation requirements. **Please provide technical assistance**.

- **Welding certification training was entered as Skills Upgrading & Retraining, but should be Occupational Classroom (Other Non-WIA funding, no ITA)**

WCI Response: Participants are no longer entered into Skills Upgrading and Retraining. Guidance was sought on this following DWD guidance to close all services in Skills Upgrading and Retraining and was not provided, **please provide technical assistance**.

- **Participant was already in training at participation date—start date of training service should be 4/21/2015 (not 4/30/2015)**

WCI Response: No contest, changes to ASSET not made due to participant being exited.

- Transportation Assistance service dated 4/27/2015-9/30/2015—dates do not match voucher dates in the file. #13776, $600, 4/22/2015-6/25/2015. Service dates should be 4/22/2015-7/31/2015
- #14453, $620, 7/6/2015-7/31/2015 (flat rate transportation – Transportation Assistance 7/5/2016 – 7/31/2015.)

WCI Response: No contest, new provider policy implementation. Standard for voucher issuance has been updated to reflect that a voucher start date needs to coincide with the service screens. Updated practice to be in effect on 10/1/17.

- **Multiple Transportation Assistance services entered in ASSET for the same vouchers. Services opened 4/27/2015-9/30/2015 and 7/6/2015-7/31/2015.**

WCI Response: Multiple service screens and vouchers are present in the file. Dates do match exactly but they are present. Voucher #13776 is for service screens 4/27/2015 – 9/30/2015 and voucher #14453 is for service screen 7/6/2015 – 7/31/2015. **Please clarify the issue.**

WCI general practice has been to issue multiple vouchers for transportation services in lieu of one large voucher for tracking purposes. This is not the case in this instance, however, vouchering practices will be updated to ensure that individual vouchers are written for each service. New guidance to go into effect on October 1, 2017.

PIN 855385, Adult

- **Transportation Assistance vouchers issued, but no corresponding services entered in ASSET**
    - **#19367, $45.50, 7/13/2016-7/29/2016 to Ace Cab Co.**

      WCI Response: No contest, file was in the possession of the WDB at the time of the service for monitoring. Staff guidance has been provided.

    - **#14371, $238.99, 7/3/2015-7/10/2015 to Denny's Truck & Auto Service—dates on voucher do not match date (7/6/2015) entered in ASSET**

      WCI Response: Voucher was written prior to event happening to ensure the service was in place and available over the holiday period to include the range of the actual service date. A service screen was open and closed on 7/6/2015 to support the actual date the repair was made as verified with invoice from vendor through fiscal system. Clarity being sought on what service screen is missing. **Please clarify the issue**.

PIN 1886175, Adult

- **Case notes document referral to Division of Vocational Rehabilitation, but no corresponding referral service in ASSET**

  WCI Response: No contest. Provider was not aware of the requirement to enter referrals into ASSET as a referral service. Guidance will be provided to Staff to implement beginning October 1st, please provide guidance if additional measures are needed. File is exited so ASSET updates were not made.

PIN 1884486, Adult

- **Resume development indicated in file and case notes; no corresponding service in ASSET**

  WCI Response: Standard practice is to obtain a copy or a participant resume even if Staff are not assisting in the development. Guidance provided to Staff to reiterate expectation of documenting items that are collected and maintained as a part of the participant file in ASSET. **Please clarify the issue.**

- **Referrals to public assistance, medical assistance, career counseling, training, apprenticeship, and NCRC were made, but not documented appropriately in ASSET.**

  WCI Response: Case noted referrals, but not entered in services. Service screens in ASSET allow for support service provided by a Partner agency, Dept. of Veterans Affairs, federal job-training program, SNAP, TANF, health insurance assistance, child support assistance, tax prep support and any other federal or state assistance programs, non-WIOA program or community group, another WIOA program). The referrals being questioned are not available options in ASSET. **Please provide technical assistance.**

PIN 140284, Adult

- **Employment status in ASSET is "Employed" but documentation in the participant file shows the only income is from a Trust Fund. Should be "Not Employed"**

  WCI Response: Resource and Referral form shows that he was a Living Assistant for his grandfather, which was unpaid. He was compensated with shelter, car insurance, and other non-wage benefits. WCI interpreted this to meet the definition provided in the WIASRD. **Please provide technical assistance.**

- **Participant is co-enrolled in FoodShare Employment and Training program, but corresponding service not entered in ASSET**

  WCI Response: No contest, service entered. New standard to implement into effect 10/1/2017.

AREA OF CONCERN 6: Case Management Issues

PIN 1876046, DW

- **Follow-ups are not documented in Manage Follow-ups Follow-up status**

  WCI Response: WCI was not aware that this was a required element. **Please provide technical assistance.**

- **Follow-up activities are not adequately case noted in ASSET**

  WCI Response: There are currently fourteen instances of case notes after closing active services between 6/1/2016 to final case note on 7/7/2017. **Please clarify the issue.**

PIN 630814, DW

- **IEP not updated every three months as required by local policy; 4/15/2015-9/30/2015, 9/30/2015-8/8/2016**

  WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016. Prior to that the frequency was every 6 months. The first gap was Ok by the policy of the time. The remaining are out of compliance while working on systems and processes to implement the new standard and attempts are documented. Guidance requested on IEP standards and implications of documented attempts and participant lack of engagement. Please provide technical assistance.

- **IEP update in file dated 11/14/2016, several months after system-generated exit date of 8/16/2016**

  WCI Response: WCI does not see an IEP update for 11/14/2016, **please provide technical assistance.**

- **Transportation Assistance was provided by Trade Adjustment Assistance (TAA) 8/24/2015-2/22/2016; and by WIOA 10/1/2015-10/31/2015 during the same timeframe. TAA was funding transportation for training, and WIOA paid transportation for employment-related activities during the same timeframe. Shows poor coordination of services.**

  WCI Response: TAA case note 11/24/2015 states that participant was not receiving any TAA services at that time. Last TAA case note prior to that was dated 8/7/2015 state that participant failed the CDL permit test so was not able to attending training in the fall. WIOA services were provided in the absence of TAA, **please provide technical assistance**.

PIN 906822, DW

- **IEP not updated every three months as required by local policy; 3/17/2016-8/22/2016-no update. First IEP was completed at enrollment on 3/17 next update should have occurred on 6/17 and did not.**

  WCI Response: No contest.

- **IEP does not identify supportive service needs**

WCI Response: Comprehensive assessment and case notes were used to identify the need for supportive services. **Please provide technical assistance.**

PIN 1530105, DW

- **IEP does not identify Childcare Assistance as a necessary supportive service.**

WCI Response: The need for Childcare Assistance is documented with case notes 5/6/2013, 7/15/2013, 7/17/2013, and 8/13/2013. First voucher written for child care was for 9/3/2013. Technical assistance being sought regarding requirements surrounding supportive services and the IEP relationship and standard versus the documentation in comprehensive assessment and case notes. **Please provide technical assistance.**

PIN 1205142, DW

- **IEP not updated every three months as required by local policy; 12/31/2015-5/6/2016, 5/6/2016-1/5/2017**

WCI Response: No contest, policy was approved by the full board on 2/15/16 and staff contacted with participant regarding IEP mentioned in case notes dated 12/31/2015, 5/5/2016, 5/6/2016, 11/22/2016, 4/3/2017, 5/1/2017, and 7/31/2017.

- **IEP dated 1/5/2017 is not signed by the participant**

WCI Response: No contest, staff guidance and reiteration of policy and practice provided to the unit.

- **Gap in case notes: 11/4/2016-3/7/2017**

WCI Response: No contest, staff guidance and retraction of policy and practice provided to the unit. Last case note reports are pulled on a quarterly basis as an additional step to monitor compliance to the standard frequency of participant contact.

PIN 1532808, DW

- **Employment status in ASSET (Employed) does not match documentation in participant file showing the participant had received notice of termination/layoff at intake**

WCI Response: Participant was still employed at enrollment as they had received notice of layoff but were not yet dislocated, please provide technical assistance on how this should be documented in pending layoffs. **Please provide technical assistance.**

- **NTOs in ASSET marked "No"; does not match signed Participant Rights & Responsibilities form in file**

WCI Response: No contest. NTO is discussed with all participants as a standard intake process element but was not in place in 2013.

- **IEP not updated every three months as required by local policy; 5/13/2013-11/17/2014, 11/17/2014-6/28/2016**

WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016. Prior to that the frequency was every 6 months, **please clarify the issue.** The instances from 5/13/2013-11/17/2014 are within policy. 11/17/2014 -6/28/2016 would fall to this policy **no contest.**

- **Follow-ups not completed accurately—not entered in Manage Follow-ups Status, no case notes entered after the exit date, follow-up services have planned dates only**

  WCI Response: Closed from WIOA 3/9/2015, but did not exit until 6/28/2016, due to use of the Job Center. There are about 32 case notes after 3/9/2015, when follow-up began. WCI does not understand the correlation with planned dates for follow up services and ASSET composition and would like further guidance. **Please provide technical assistance.**

PIN 1671084, DW

- **IEP not updated every three months as required by local policy; 6/29/2015-12/18/2015, 12/18/2015-7/18/2016, 7/18/2016-Present**

  WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016. Prior to that the frequency was every 6 months. On 9/7/2016, participant went into Planned Gap in Service and practice would be to not update IEP during that gap, **please provide technical assistance**.

PIN 1901393, DW

- **IEP does not clearly identify participant's career goal(s)**

  WCI Response: No contest. This is a new standard that will be implemented as "full time self-sustaining employment" was previously accepted as a goal for a participant without a specific career goal who was low skills and multi barrier and simply seeking entry level employment to meet their needs.

- **IEP not updated every three months as required by local policy; 4/25/2016-3/22/2017**

  WCI Response: No contest, unsuccessful attempts to update the IEP were documented: EC mailed letter to participant 10/4/2016 notifying of need to update every 3 months. EC called participant 10/11/2016 to schedule apt. to update IEP. EC left VM 10/20/2016 to schedule appointment to update IEP. EC called 11/9/2016 to schedule appointment (participant was at work and couldn't talk), EC requested contact 3/7/2017 with Job Center Newsletter, EC emailed 3/22/2017 with IEP attached.

PIN 1682863, Adult

- **IEP not updated every three months as required by local policy**

  WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016 prior standard was every 6 months. IEPs 5/12/2014, 12/1/2014, 12/23/2014 (unsigned), 1/20/2015, 9/1/2015 within the 6-month standard. Efforts to obtain updated IEP shown on: 3/22/2016, 4/21/2016, 5/20/2016 t, 8/2/2016, 8/22/2016, 9/20/2016, 9/26/2016, 10/6/2016. Participant was closed on 12/12/2016 for lack of return contact from the participant. Guidance being sought regarding the documentation of efforts and IEP implications following the participant not complying. **Please provide technical assistance.**

- **IEP does not document need for supportive services**

  WCI Response: IEP does not contain the need for Supportive Services but they are documented on the Comprehensive Assessment, Supportive Service Needs section, Comments and Needs Summary says "Possible assistance with uniform, stethoscope, shoes for training. 7/16/14". **Please provide technical assistance.**

PIN 1539560, Adult

- **IEP not updated every three months as required by local policy; 4/29/2013-7/21/2014**

  WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016 prior standard was every 6 months. **Please clarify the issue.**

- **First ASSET case note entered is several months after participation date**

  WCI Response: No contest, issue was identified in an internal monitoring. Participant enrolled on 4/29/2013 and first case note is present on 5/13/2013. Staff guidance provided on case noting expectations and requirements of timely entry.

PIN 340265, Adult

- **IEP not updated every three months as required by local policy; 4/28/2015-no update through exit date**

  WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016 prior standard was every 6 months. **Please clarify the issue.**

- **Gaps in case notes: 12/2/2015-6/13/2016, 8/22/2016-Present (per CN #4727340 dated 2/17/2017 indicates participant requested no contact)**

  WCI Response: Multiple case notes present including: 12/4/2015, 12/21/2015, 12/31/2015, 2/1/2016, 2/15/2016, 3/4/2016, 3/21/2016, 4/5/2016, 4/21/2016, 5/31/2016, 6/13/2016, 6/15/2016, 8/23/2016, 10/18/2016, 11/22/2016, 1/16/2017, 2/17/2017, 3/3/2017, 4/4/2017, 5/15/2017, etc. **Please provide technical assistance.**

PIN 855385, Adult

- **Initial IEP developed 6/1/2015—several months after participation date**

  WCI Response: No contest. IEP services are checked as a standard part of the enrollment Edit check process with the Operations Coordinator to prevent future instances of this.

- **IEP not updated every three months as required by local policy; 6/1/2015-4/13/2016, 4/13/2016-exit**

  WCI Response: IEP Case notes show documented attempts on 12/21/2015, 2/1/2016, 3/4/2016, 4/5/2016 and the update on 4/13/2016. Guidance being sought on process and requirements for documenting attempts and the implications that has on the IEP when the participant is not complying. **Please provide technical assistance.**

- **Q1 follow-up not entered in Manage Follow-ups Status**

  WCI Response: Clarity being sought on requirements of reporting for follow up. **Please provide technical assistance.**

- **Supportive service need not documented on IEP**

  WCI Response: No contest. Comprehensive Assessment Comments and Needs Summary says "Mileage associated with job search. Reimbursement for interview clothing or uniform." Other support received was for cab fares, vehicle repair, replacement birth certificate, and one month's rent. **Please provide technical assistance.**

- **Case note #4597589 dated 9/1/2016 indicates participant will be exited to employment—this does not match the system-generated exit date of 11/4/2016. Case Management and Assisted Job Search & Placement services remained open in ASSET, but no services were being provided during that timeframe.**

  WCI Response: Case note dated 9/1/2016 said that he will be exited to employment but does not provide a date. Case note dated 11/4/2016 created on 11/15/2016 with a summary line of "Closed" and comments for employment. Employed at Goodwill in Tomah as a Donations Attendant. Guidance being sought on how to update the service screens as participant is exited. **Please provide technical assistance.**

- **Gaps in case notes: 1/4/2016-4/5/2016, 10/7/2015-1/4/2016**

  WCI Response: Case notes are present in file 2/1/2016, 3/4/2016, and 4/5/2016 and 10/7/2015, 10/8/2015, 11/6/2015, 12/2/2015, 12/4/2015, 12/21/2015, 12/31/2015, 1/4/2016. **Please clarify the issue.**

PIN 653406, Adult

- **IEPs not updated every three months as required by local policy; 5/31/2016-11/3/2016, 11/3/2016-3/22/2017**

  WCI Response: Case notes surrounding about IEP updates and attempts are documented 5/31/2016, 9/20/2016, 10/4/2016, 10/10/2016, 11/3/2016, 11/7/2016, 11/28/2016, 3/7/2017, 3/22/2017, 4/19/2017, 6/20/2017, 6/26/2017. Guidance being sought on process and documentation for participants not complying and the expectations and implications on the IEP process. **Please provide technical assistance.**

- **IEP updates dated 11/3/2016 and 3/22/2017 are not signed**

  WCI Response: No contest. Case note 11/3/2016 states that staff met with participant and reviewed the IEP, but due to printer issues was unable to print and sign, staff then mailed the IEP on 11/7/2016 as reflected in case notes. The 3/22/2017 case note states that EC called to schedule appointment to update IEP, but had to leave a message. Staff then emailed the IEP to participant for approval. **Please provide technical assistance.**

- **WIOA funded CNA test, but no test results present in file**

  WCI Response: Participant did not pass the test as can be seen in case notes and documented as participant works towards retaking their skills portion of the CNA exam. Final results will be added to participant file when available. **Please clarify the issue.**

PIN 1886175, Adult

- **Supportive services provided (steel toed boots) were not identified in the IEP**

  WCI Response: No contest, staff guidance provided. Two instances of case notes reflect the notification of the voucher being ready and the pick-up of the voucher no other documentation of need or services indicated.

- **Final IEP shows Welding certificate as a goal, but case note #4533951 states he finished training and did not like it.**

  WCI Response: Contact with the participant became an issue following the training as can be seen in the case comments documenting attempts to contact and missed appointments. Participant did

not share an updated goal following the completion of the training. Guidance being sought on what should have occurred following the lack of participant engagement and documented attempts. **Please provide technical assistance.**

- **IEP not updated every three months as required by local policy.**

  WCI Response: No contest, staff documented unsuccessful attempts to engage participant.

- **Assessment results (social) not used to information career/training goals (Welding)**

  WCI Response: Participant was registered for training in the Welding Institute at enrollment and as such his assessment was not used to influence the career goal already set on course but was available should career exploration become an option. **Please clarify the issue.**

PIN 1743916, Adult

- **IEP not updated every three months as required by local policy**

  WCI Response: Three-month frequency started with Policy on Participant Updates approved by the full WDB on 2/15/2016 prior standard was every 6 month: 8/2/2015, 8/26/2015; Standard changed to every 3 months: 10/28/2016, 3/6/2017, 3/7/2017, 5/26/2017, 7/7/2017. **Please clarify the issue.**

PIN 140284, Adult

- **IEP not updated every three months as required by local policy; 2/18/2016-9/30/2016, 9/30/2019-1/17/2016**

  WCI Response: Attempts to update IEP are documented on 7/26/2016, 9/14/2016, and 9/21/2016 as well as 10/21/2016 and 11/22/2016. Guidance being sought on what to do in the case of a participant not responding and documenting efforts and implications on documentation and IEP process. **Please provide technical assistance.**

- **IEP does not include the participants career/training goals**

  WCI Response: The On the Job Training is listed in the Skills to develop. **Please clarify the issue.**

- **Gaps in case notes: 10/21/2016-1/17/2017**

  WCI Response: Case notes are present 10/21/2016, 10/31/2016, 11/16/2016, 11/22/2016, 12/28/2016, and 1/16/2017, **please clarify the issue.**

Area of Concern: File documentation issues

PIN 906822, DW

- **Vouchers in file for supportive services (uniform items), but no supporting receipts in the file**

  WCI Response: Copies of voucher are present in the file (Voucher #19710 and #17989) and receipts have been obtained from the fiscal record and copies placed in the file. Supporting fiscal documentation is housed with the invoices from the vendors in our fiscal records and available upon request to view the record. No such requests were made during the monitoring. **Please clarify the issue.**

PIN 1205142, DW

- **IEP signature page in file dated 4/8/2017—the rest of the document is missing**

  WCI Response: No contest, guidance provided to Staff to ensure the entire document is present in the file.

- **Comments in the Skills Upgrading & Retraining service do not correspond with vouchers present in the participant file**

  WCI Response: No contest. Technical assistance regarding Skills Upgrading and Retraining have been requested.

PIN 1532808, DW

- **JSKS and LEAP assessments in file do not include the date of completion**

  WCI Response: No contest, guidance provided to unit to ensure assessments are documented in services and case notes.

- **IEP documented dated 11/17/2014 not signed by participant**

  WCI Response: No contest, process agreed upon by service provider and WDB had staff printing IEP while in the process of obtaining signatures. Please provide technical assistance on IEP processes and expectations.

- **No class schedules or other documentation for Spring 2014 training semester. Voucher #9905 dated 1/7/2014-4/25/2014 for $500 for Spring 2014 Medical Assistant training.**

  WCI Response: Spring 2014 schedule, grades, financial aid, and billing for Spring 2014 are present in the file. **Please clarify the issue.**

- **Voucher #10056 dated 1/27/2014-2/28/2014 for $110 for Medical Assistant required supplies—no receipts or other supporting documentation.**

  WCI Response: Receipt from Degen Berglund to support this voucher was is in the file under the Training tab and has been moved under the Voucher tab next to specific voucher for ease and clarity. **Please clarify the issue.**

- **Voucher #10969 dated 5/5/2014-8/19/2014 for $408.87 for Summer 2014 Medical Assistant training—no class schedule or other supporting documentation.**

  WCI Response: Transcript, billing, schedule, and financial aid are all under the Training tab for Summer 2014, **please clarify the issue**.

PIN 1671084, DW

- **No vouchers or other documentation to support that participant was in training after Summer 2016. ASSET Services remain open 7/1/2016-8/31/2016 and 9/1/2016-9/7/2016.**

  WCI Response: Staff notified 9/5/2016 of the need for a Planned Gap in Service. See 8/28/2016 case note. Current practice is to keep participants open in training throughout all terms of the training. Case note dated 8/28/2016 indicated the need for a planned gap so subsequently Staff closed the training service 9/7/2016 and started the Planned Gap. In December, directed by the WDB to enroll in the RR Transition Grant for 7/1/2016 - 8/31/2016. The last date of training was April 30, 2017. **Please provide technical assistance**.

- **IEP update in file dated 12/27/2015 is not signed**

  WCI Response: Case note on 12/27/2015 states that the IEP was emailed for signature, copy was printed and placed in file to document changes to IEP and efforts to obtain signature. Guidance being sought on preferred process to document efforts. **Please provide technical assistance.**

PIN 1899340, DW

- **IEP in file dated 1/31/2017 is not signed by participant or case manager**

  WCI Response: IEP printed to show attempt to obtain signature as documented in case comment from 1/31. Participant did not return a signed IEP which would have replaced the unsigned version. This was agreed upon locally with the WDB and case notes show lack of contact and attempts to obtain signature. **Please provide technical assistance.**

PIN 1901299, DW

- **Occupational Classroom service entered in ASSET (using WIODW fund source w/ ITA established), but no evidence in participant file or case notes that participant received any funding for the training.**

  WCI Response: No funds were spent on training for this participant. Participant had enrolled in training prior to completing program enrollment then the participant withdrew from course due to medical issues as documented. Funding source updated to Other Non- WIA. **Please clarify the issue.**

- **Insufficient documentation to justify Planned Gap in Service**

  WCI Response: Case notes document attempts to gather documentation to support the participant's disclosure of medical condition as well as attempts to contact training provider to obtain documentation. Training provider confirmed drop out due to medical as noted in case notes and participant stopped contacting as well as alternative contact. File closed of lack of contact/participation. **Please provide technical assistance**.

PIN 1901393, DW

- **IEP updated in file dated 3/22/2017 is not signed by participant**

  WCI Response: IEP printed and in file to document the attempts to update IEP in place of not having an IEP as a practice agreed upon between the WDB and provider. The attempts to obtain signature are also documented in case notes on 3/22/2017. **Please provide technical assistance.**

- **IEP review service on ASSET dated 9/22/2016- no corresponding document in file**

  WCI Response: No contest, Staff emailed IEP to participant for signature 9/22/2016 per case notes and have been directed to copy IEP for file before emailing.

- **Other Support Service in ASSET dated 5/5/2016 for Interview Clothing/Shoes—no corresponding voucher in file**

  WCI Response: Voucher #18547 is in the file as noted in area of concern previously in report. **Please clarify the issue**.

- **Other Support Service in ASSET dated 5/16/2016 for Steel-toed Boots—no corresponding voucher in file**

  WCI Response: Voucher #18661 is present in the file for steel toed boots, **please clarify the issue**.

- **Voucher #19451 dated 7/18/2016 for Other Support Service (non-skid shoes)—no receipt or other corresponding documentation**

  WCI Response: Receipts for this vendor are included as a part of the documentation housed in the fiscal department. This vendor submits receipts with their invoice to our fiscal department in lieu of issuing them to the participant. Receipts have been obtained from fiscal and placed with the vouchers in the participant file. This documentation is available upon request. No requests were made during this monitoring. **Please clarify the issue.**

- **Other Support service in ASSET dated 7/1/2016-8/5/2016 for required work clothes for $300 at Kohls-no corresponding voucher in file**

  WCI Response: This service screen was added for rolling over to Transition Grant as directed by the WDB. The service screen was for Voucher 19070 as seen on the event history on the Other Support Service Assistance screen starting 6/16/2016. On 9/15/15 the service was closed to reflect 8/5/2016. In December the WDB directed us to enroll all DW services to Rapid Response for the period of 7/1/2016- 8/31/2016. At this point the close date as changed from 8/5/2016 to 6/30/2016 and then a service created for 7/1/2016-8/5/2016 to fulfill the WDB's request. **Please provide technical assistance.**

PIN 1682863, Adult

- **Credential entered in ASSET Manage Follow-ups Credentials, but no supporting documentation in file**

  WCI Response: Application for Graduation for completing Medical Assistant program 12/12/2014 in file, **please clarify the issue.**

PIN 1539560, Adult

- **O*Net assessment in file only includes first name of participant, and does not include a completion date**

  WCI Response: No contest, guidance provided to staff to ensure documentation in ASSET is completed as well assurance of naming on documentation in file.

- **Initial assessment does not identify participant by name or PIN**

  WCI Response: No contest, staff guidance provided.

- **IEP service in ASSET dated 4/29/2013—document is not in file**

  WCI Response: No contest, staff guidance provided on IEP process and expectations.

- **Transportation Assistance provided—no mileage logs or other supporting documentation in participant file**

  WCI Response: No contest, these vouchers were written in PY 12 as fuel assistance to attend training. The need for the fuel assistance was documented however standard practice at the time did not have participants submitting travel logs to support the purchase of fuel only. Class schedule is present in file to support travel need.

PIN 1743916, Adult

- **TABE in file has no name or results**

  WCI Response: No contest, assessment has been removed from participant file.

PIN 1884486, Adult

- **Voucher #18880 for $75 for clothing at Kohl's in file—no supporting receipt or other documentation**

  WCI Response: This voucher was voided and not used. A copy of the voided voucher is present in the participant file. Staff guidance provided to ensure that the voiding of vouchers is documented in case notes as well as participant file. **Please clarify the issue.**