



DEPARTMENT OF ECONOMIC OPPORTUNITY
CareerSource Capital Region
February 7 – February 11, 2022
LWDB 05 Preliminary Review Exit Summary

WELFARE TRANSITION (WT) PROGRAM

Participant Case File Review

A total of 18 participant case files were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WT	1. There was an instance where the safety plan was not developed for a victim of domestic violence. Additionally, elements from the safety plans were not included in the IRP/ARP.	<u>Domestic Violence Guidance AWI F G 02-026 and Relocation Guidance AWI FG 01-023, and 414.065 (F.S.).</u>	Y	Y	N/A	N/A	N/A	The LWDB program staff must develop a safety plan for all participants that disclose they are victims of domestic violence and ensure that elements from the safety plan are included in the IRP/ARP for victims of domestic violence to identify resources, address barriers to self-sufficiency and to outline the steps to help keep the family safe.

	<p>2. Initial assessments were not completed within 30 days of the individuals becoming eligible for cash assistance during the review period for a couple participants..</p>	<p><u>45 CFR 261.11-12, 14; Temporary Assistance for Needy Families (TANF) State Plan; DEO Memorandum dated October 22, 2014, titled Individual Responsibility Plan, Alternative Responsibility Plan, and Initial Assessment in OSST.</u></p>	<p>N</p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>The LWDB must ensure that an initial assessment is completed within 30 days of the case becoming mandatory and includes all required components.</p>
	<p>3. The following issues were identified for the pre-penalty and sanction process:</p> <ul style="list-style-type: none"> • There was no evidence of a verbal attempt to contact and/or counsel severale participants during the 10-day counseling period when a pre-penalty was initiated. • In a several instances, the penalty process was not initiated or requested in the OSST system in a timely manner. • During the sanction process, several participants had sanctions ended with good cause when it should have been complied. 	<p><u>45 CFR 261.14, 414.065 (F.S.), 65A-4.205, Florida Administrative Code, and FG 03-037.</u></p>	<p>Y</p>	<p>Y</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>LWDB staff must ensure that an attempt to contact the participant during the 10-day counseling period is conducted and case notes are entered in OSST. The reviewer must be able to determine that the participant was counseled regarding the failure if the penalty is ended with complied or other during the 10-day period. Additionally, penalties must be initiated and requested when participants are noncompliant with program requirements. Good cause reasons for failing to comply should be outlined in the LWDB’s local operating procedures. (medical, domestic violence, childcare, SSI)</p>

	4. Mandatory childcare services were provided for a couple participants without the participants receiving cash assistance.	<u>TANF State Plan 2017-2020, (s. 414.075, F.S.)</u>	Y	Y	N/A	N/A	N/A	The LWDB must ensure that participants are receiving temporary cash assistance before providing mandatory childcare services. If continuing eligibility is not verified for mandatory services, funds could possibly be expended on ineligible participants which could be viewed as potential questioned costs if not corrected.
	5. A couple participant case files did not contain the required eligibility documentation to support continuous transitional services being provided. Additionally, transitional services were not ended timely for several participants. (ONI)	<u>445.028-32, F.S., 65A-4.218 and Transitional Childcare Guidance.</u>	Y	Y	N/A	N/A	N/A	Program staff must ensure that transitional eligibility documentation is secured and retained in the participant's case file. Individuals receiving Transitional Childcare should be required to provide documentation of continued employment on a monthly basis as specified in local operating procedures. Additionally, program staff must ensure that documentation is retained in participant case files verifying any support services received. <i>(NOTE: This is a possible disallowed cost.)</i>
	6. Documentation retained in a participant case file did not support Job Participation Rate (JPR) hours reported to the Department of Children and Families or Health and Human Services. Additionally, a job search/ job readiness activity was not closed timely.	<u>445.010, 45CFR 261.60-62, 45CFR 262, and Florida's Work Verification Plan.</u>	N	Y	N/A	N/A	N/A	Program staff must ensure that they accurately count and verify job participation hours before entering any information in OSST and that timesheets used to support the hours are maintained in the participant case files.
Totals			4	6	0	0	0	

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM- EMPLOYMENT AND TRAINING (SNAP E&T)

Participant Case File Review

A total of 17 participant case files were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
SNAP E&T	1. A participant did not receive an orientation and assessment in accordance with the State Plan.	<u>CFR 273.7; 7 CFR 273.24(a)(1)(i) and the SNAP State Plan. Memo dated January 5, 2017</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure participants complete orientation and assessment during the initial engagement process every 12 months.
	2. Signed and dated Grievance/Complaint and Equal Employment Opportunity (EEO)/Discrimination forms were missing from a participant's case file.	<u>7 CFR 273.7; 7 CFR 273.24(a)(1)(i) and the SNAP State Plan.</u>	Y	Y	N/A	N/A	N/A	LWDB staff must ensure Grievance/Complaint and EEO/Discrimination forms are signed and dated at the time of completion and maintained in the case file.
	3. A participant was not assigned to 80 hours in work activities.	<u>7 CFR 273.7; 7 CFR 273.24(a)(1)(i); and the SNAP State Plan.</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure that participants are assigned to the mandatory work requirement of 80 hours per month.
	4. A participant did not have their initial appointment code 590-status code ended timely (i.e. within two business days).	<u>Memo dated January 5, 2017.</u>	N/A	N/A	Y	Y	N/A	LWDB staff must ensure that the 590-status code is ended in OSST within two business days of completion of the appointment or no-show.
	5. The LWDB SNAP LOP elements were not current with federal law and state guidance.	<u>Grantee – Subgrantee Agreement.</u>	N/A	N/A	N/A	N/A	Y	LWDB must develop SNAP LOPs with required elements established in law and policy.
Totals			1	3	1	1	1	

COLLECTION OF DEMOGRAPHIC DATA

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

FINANCIAL DISCLOSURE

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
	1. LWDB’s local coordinator did not timely provide the names of the new board members to the Commission on Ethics.	<u>Authority – Sections 112.3145 and 445.007, Florida Statutes; and DEO Final Guidance (FG-075), Required Financial Disclosure.</u>	N/A	N/A	N/A	N/A	Y	LWDB must ensure that names of new members and/or the executive director are provided timely to the Commission on Ethics.
Total			0	0	0	0	1	

LOCAL DEO MERIT STAFFING STRUCTURE

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

SECTOR STRATEGIES

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

BOARD GOVERNANCE

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

ADULT AND DISLOCATED WORKER PROGRAM

Participant Case File Review

A total of 22 participant case files (20 adults and two dislocated workers) were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WIOA Adult and Dislocated Worker Program	1. In several instances MSGs were not recorded in Employ Florida for the applicable program year in which the participants were enrolled in an educational or training program for a couple of participants.	<u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u>	N/A	N/A	Y	Y	N/A	The LWDB must ensure that participants who are enrolled in an education or training program have an MSG recorded in the applicable program year. If the includable activity crosses program years, an MSG for each program year must be documented and recorded.
Totals			0	0	1	1	0	

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

YOUTH PROGRAM

Participant Case File Review

A total of 13 Out of School participant case files were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
Workforce Innovation and Opportunity Act (WIOA) Youth Program	1. In a few instances, a measurable skills gain (MSG) was not recorded in Employ Florida for the applicable program year in which the participant was enrolled in an educational or training program.	<u>Federal Data Validation Requirements TEGL 10-16 Change 1, WIOA, Sec. 3(52), WIOA Sec. 129 (c) (1) (C).</u>	N/A	N/A	Y	Y	N/A	The LWDB must ensure that participants who are enrolled in an education or training program have an MSG recorded in the applicable program year. If the includable activity crosses program years, a MSG for each program year must be documented and recorded.
	2. In a couple of instances, system	<u>TEGL 10-16 Change</u>	N/A	N/A	N/A	N/A	Y	The LWDB staff must provide adequate case management

	closures occurred on activities while participants were actively participating in the WIOA program.	<u>Master Cooperative Agreement and Federal Data Validation Requirements.</u>						for all participants receiving services that require staff assistance. When a system closure is activated, it is a strong indication that case management was not properly provided. It is strongly recommended that case managers pay close attention to projected end dates and close or extend activities as needed.
Totals			0	0	1	1	1	

WIOA SPECIAL PROJECTS

- Hurricane Michael Dislocated Worker Grant: three (3) participant case files
- COVID-19 Dislocated Worker Grant: three (3) participant case files
- LWDB 05 – Sector Strategies 2019 – Manufacturing Sector Strategy Training Grant – Adult: three (3) participant case files

Participant Case File Review

A total of nin (9) participant case files were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other ONI	Current Year ONI	Observation	Recommendation
WIOA Special Projects	1. Quarterly follow-ups for performance reporting were not conducted for four participants, and required entries were not made in the follow-up table in Employ Florida	<u>WIOA sec. 116, 20 CFR 677.175 Grantee-Subgrantee Agreement</u>	N	Y	N/A	N/A	N/A	The LWDB must provide an assurance that follow-up contacts will be made to obtain post-exit performance information (employment, wages, credentials, e.g.) and enter such information into Employ Florida. If the participant cannot be located, a case note must be recorded to document follow-up attempts.

Totals			0	1	0	0	0	
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TRADE ADJUSTMENT ASSISTANCE (TAA)

Participant Case File Review

A total of one (1) participant case file was reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
TAA	1. The participant did not receive Rapid Response services.	<u>Trade Act 2002, TAARA 2015 & Administrative Policy No.114, TEGs 22-08, 10-11, 7-13 TEG 11-02, 05-15, 20 CFR 682.300 - 682.370, DEO Memo Rapid Response Requirement Dated 02/14/20, PIRL and USDOL TAA Data Integrity Requirement</u>	N	Y	N/A	N/A	N/A	Per the Workforce Innovation and Opportunity Act, LWDBs are required to deliver rapid response services to the affected employer and workers in accordance with Title 20, Part 682.302 of the Code of Federal Regulations. Upon notification of a filed TAA petition, the LWDB's rapid response team must provide rapid response services to the affected employer and workers in accordance with local operating procedures. When receiving a new participant and/or a referred participant from another region, the Local TAA Coordinator must verify

								rapid response services were provided and update the case file. The State Trade Program recognizes this participant is a transfer and will make note in the final report. The Local TAA Coordinator serving the participant is responsible for obtaining old case notes, service history, and other information from the previous coordinator to ensure the case file is accurate and complete.
	2. The Individual Employment Plan (IEP) was created, but it was not reviewed and, if necessary, amended every 60 days.	<u>20 CFR 617.20,</u> <u>20 CFR 618,</u> <u>TEGLs 22-08,</u> <u>10-11, 7-13,</u> <u>05-15 and</u> <u>Administrative</u> <u>Policy No. 107</u>	N/A	N/A	N	Y	N/A	The IEP must be treated as a living document and reviewed by the Local TAA Coordinator on a regular basis with the participant. At a minimum, the IEP must be reviewed every 60 days. The IEP must be amended, as appropriate, when additional needs are identified, or objectives are achieved. When new objectives are added, the IEP should be reviewed and signed by the TAA participant and accompanied by service code T05 (TAA - Individual Employment Plan (IEP)) and include

								a case note that aligns with the requirements prescribed in the Employ Florida Service Code Guide.
Totals			0	1	0	1	0	

WAGNER-PEYSER (WP) PROGRAM

Participant Case File Review

A total of 50 (20 job seekers, 15 job orders, 10 placements and 5 PREP) case files were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
WP	1. A few MSFWs were not properly coded or identified in Employ Florida.	<u>20 CFR 653.103 and DEO FG 03-040.</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure an MSFW designation in a job seeker registration and application is verified prior to providing a service that triggers participation.
	2. A couple of job seekers had services that were not fully and adequately documented in Employ Florida. Additional service documentation was not individualized for specific job seeker services.	<u>TEGL 17-05; Federal PIRL reporting; DEO AP 096 (rev. 1/07/2021), 099 (rev. 2/20/2020), and 115.</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure services entered in Employ Florida match the type of service provided, have all required and individualized documentation, are correctly identified as triggering or continuing participation, and meet the requirements of regular, direct contact. Job seekers must not have participation extended through service code entry without supporting

								documentation or a demonstrated need for service from the job seeker.
	3. A job order with a wage rate listed below minimum wage did not have case notes on the job orders documenting staff verification that the employer will pay at least the Florida Minimum Wage rate.	<u>Fair Labor Standards Act/FL Statutes - Title XXXI Labor Section 448.01; DEO AP 099.</u>	N	Y	N/A	N/A	N/A	For job orders listed at or below minimum wage, LWDB staff must ensure they verify and document that the employer wage rate for the position is at or above the Florida minimum wage (unless exempt). Documentation must be recorded as a case note on the job order in Employ Florida.
	4. A job seeker with a staff-entered Employ Florida referral created during the review period did not have documentation of the job seekers' permission refer to the job order.	<u>20 CFR 652.207, 652.3, DEO AP 096 (rev. 2/20/2020, & 1/7/2021).</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure when staff refers job seekers to jobs in Employ Florida, job seeker permission is given and documented. Permission must be granted prior to the referral.
	5. The O*NET code listed on a job order did not match the job description.	<u>20 CFR 652.3 and DEO AP 099.</u>	N/A	N/A	N	Y	N/A	The LWDB must ensure that the O*NET code matches the job description on a job order. Using O*NET codes that do not correspond with the job description and/or job title makes the job matching process difficult.
Totals			0	4	0	1	0	

CAREER CENTER CREDENTIALING

A Career Center Credentialing review was conducted to determine compliance with program guidance. The methodology for conducting the review will include self-certification by the LWDB that the following credentialing requirements had been met for the review period at each of the career center locations in the LWDA (posters, signage and resource room verification). All other administrative requirements and records (listing of front-line staff, continuing education hours attained, etc.) were reviewed by the monitor.

The monitor also reviewed the administrative documents provided to determine whether all “front-line” staff members had completed their required Tier I Certification courses and the 15 hours of continuing education courses in related subjects. As part of the credentialing process, the monitor reviewed the LWDB’s complaint system to ensure that a system is in place to process any Wagner-Peyser complaints received. No issues were observed.

MANAGEMENT INFORMATION SYSTEMS (MIS)

The LWDB provided policies and procedures ensuring that individuals who are no longer employed in the LWDB are promptly removed from having access to the MIS. The LWDB provided an up-to-date listing of all MIS users during the review period who have had their status revoked. No issues were observed.

The LWDB provided documentation to provide support to the policies and procedures ensuring a background screening was conducted for some new staff (Board, contractor, or provider) hired during the review period. Additionally, the LWDB provided documentation that all newly hired staff completed Individual Non-Disclosure and Confidentiality Certification forms and security access agreements. No issues were observed.

JOBS FOR VETERANS STATE GRANT (JVSG)

Participant Case File Review

A total of 15 case files were reviewed.

2021-2022 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
JVSG	1. One participant did not have a JVSG participation date entered.	<u>State Veteran’s Program Plan of Service; Federal WIOA/JVSG reporting requirements.</u>	N	Y	N/A	N/A	N/A	DVOP specialists must ensure the first step taken before any codes are entered is to create a JVSG participation date.
	2. One participant did not receive priority of service 189 where a code 089 was not present.	<u>20 CFR 1010, DEO Administrative Policy 096, 102, and 111.</u>	N	Y	N/A	N/A	N/A	Staff must ensure eligible persons are notified of and receive priority of service and enter it into their Employ Florida account utilizing service code 189.

	3. One participant did not have a service code 189 entered until 20 days after receiving a 102 (initial assessment).	<u>20 CFR 1010, DEO Administrative Policy 096, 102, and 111. Policy 096, 102, and 111.</u>	N/A	N/A	N/A	N/A	Y	Staff must ensure eligible persons are notified of and receive priority of service and enter it into their Employ Florida account utilizing service code 189.
	4. One participant's IEP was incorrectly entered into the IEP Wizard.	<u>20 CFR 651.10</u>	N/A	N/A	N/A	N/A	Y	DVOP specialists must ensure the IEP Wizard is used properly.
	5. One participant did not receive services from a DVOP specialist until 10 days after a 102 (Initial Assessment) was entered.	<u>DEO Administrative Policy 117.</u>	N/A	N/A	N/A	N/A	Y	DVOP specialists must ensure SBE veterans referred to them are contacted within 2 business days.
	6. Four participants never received any contact from a DVOP specialist after receiving a 203 (Objective Assessment) and a 205 (IEP).	<u>DEO Administrative Policy 117.</u>	N/A	N/A	N/A	N/A	Y	DVOP specialists must ensure they have consistent contact with the veterans they are serving and document it appropriately in Employ Florida.
	7. Four participants had DVOP specialists use service codes 117 (Outreach) and 202 (Career Guidance) for follow-up services instead of code 136 (Follow-up Services)	<u>Employ Florida Service Code Guide</u>	N/A	N/A	N/A	N/A	Y	Staff must ensure they properly use the Employ Florida Service Code Guide.
Totals			0	2	0	0	5	

MIGRANT AND SEASONAL FARMWORKER PROGRAM (MSFW)

A total of 46 Employment Service (ES) complaint logs were reviewed.

A review of the LWDB's Employment Service (ES) and Employment-related Law Complaint System did not **reveal any Findings, Other Noncompliance Issues or Observations.**