

Terry E. Branstad, Governor

Kim Reynolds, Lt. Governor

Beth Townsend, Director



August 23, 2016

Linda Langston, Chair
Region 10 Regional Workforce Investment Board
935 2nd St. SW
Cedar Rapids, IA 52449

Bob Yoder, Chair
Region 10 Chief Elected Officials
PO Box 889
Washington, IA 52353

Dear Linda and Bob:

For WIOA PY15, state team reviewed the management information system and worked with the office electronically to provide any requested proof necessary to substantiate program compliance. I want to thank all of the team members involved for their assistance in providing needed documentation as we conducted our reviews electronically for the PY15 year.

The Quality Assurance Review is intended to identify the strengths in Workforce programs in Region 10 and also areas where Technical Assistance may be of the most value. The review was conducted all or in part by the Title I Quality Assurance team members: Linda Rouse, Kristi Judkins, Wendy Greenman, and Kyle Clabby.

The following *Findings* were determined:

1. Perez/4350- No evidence that adult participant was offered or made aware of Post Program Services (Follow-up).

Policy:

- Handbook- Section 14-Applicant and Participant Process
 - Page 11: *Follow-Up will be provided to those members exited as employed.*

Corrective Action:

Follow up services must be made available, as appropriate, for a minimum of 12 months following the first day of employment, to registered participants who are placed in unsubsidized employment and documented in the case file. Provide career planners training on Post Program Services and the required documentation in accordance with post program services, Title 1 Programs – Adult and Dislocated Worker section of the handbook and send state team members verification of the training no later than November 30, 2016

Provider Response:

Training will be completed on August 24th on this topic with the WIOA Title 1 Team. Documentation of training will be sent to the state.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

2. Smith/6383- The only activity open on the IEP was Guidance & Counseling and it was open since 9/30/15.

Policy:

- Handbook-Title 1 Programs-Adult & Dislocated Worker Services
 - Page 17: *G&C must be offered in combination with other WIOA partner services. G&C is not to be used as an ongoing activity. G&C may be revisited if the participant experiences a major change in his or her personal life or wishes to change his or her IEP or ISS.*

Corrective Action:

Combine G&C with another WIOA activity or partner service. Close G&C after career-related guidance has been provided and re-open if necessary. Review Handbook, Title 1 Programs, Adult and Dislocated Worker Services with career planners and send verification of training no later than November 30, 2016.

Provider Response:

This youth participant is being evaluated for service needs and will be served or exited as appropriate. Training regarding this topic will be provided August 24th and send to the state team. To ensure consultants understood training and appropriately monitor activity length, a caseload management list will be reviewed quarterly with each team member throughout FY 17 and longer as needed.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

3. Smith/6383- Individual has not had documentation of progress since 1/22/16.

Policy:

- Handbook- Section Title I Programs-Adult & Dislocated Worker Services
 - Page 14: *On-going documentation should occur every 30 days, but must occur every 90 days.*

Corrective Action:

Ensure all participants are provided meaningful contact at the minimum of every 90 days, and as a goal every 30 days. Ensure contact is documented on the IEP and case noted. Provide career planners training on participant progress, Title 1 Programs – Adult and Dislocated Worker section of the handbook and send state team members verification of the training no later than November 30, 2016.

Provider Response:

Training on timely follow ups will be completed August 24th with WIOA Title 1 consultants. Documentation will be sent to the state. A 30 day no casenotes report will also be printed reviewed quarterly with consultants to ensure they understood training and are appropriately monitoring and completing follow up and contact with customers.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

4. Hacker/7550 and Lukama/7669- Both individuals had goals that have not been reported within the one year time frame. According to policy, goals should be reported on within a year, and a new one set.

Policy:

- Handbook- Section 19-WIA Title I Programs-Youth
 - Page 28: *Each youth under age 19 must have at least one goal during each year and may have up to three goals reported for performance purposes each year. The goals do not need to be different types of goals. For example, there could be two basic skills goals and one occupational goal.*

NOTE: *For the purposes of this requirement, a year is a one-year period beginning on the enrollment date or an anniversary of the enrollment date for the first goal(s) set on the initial ISS.*

At least one goal must be set within 30 days of the enrollment date and must be reported as set on the enrollment date. If the youth is basic skills deficient, a basic skills goal must be set and reported as set on the enrollment date.

Each skills goal established must be attainable within one year of the date established. The attainment or non-attainment of each goal must be reported by the anniversary date of the goal. It is not necessary to set only one-year or 12-month skills goal attainment dates. It is often appropriate to set short-term skills goals that will lead to long-term achievement goals.

Corrective Action:

Ensure that all youth participants have a current goal that is set according to policy, and reported on within a year. Participants shall always have an open goal until such time an exit occurs. Review handbook, Title I Programs-Youth, with career planners and send verification of training no later than November 30, 2016.

Provider Response:

Training will be provided in August 24 with the WIOA Title Youth I team on youth goal development and documentation. Documentation of training will be sent to the state. Each youth case manager will review currently caseload for goals and ensure each are updated and documentation entered correctly by August 31, 2016.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

5. Smith/7137- Individual is not registered with selective service. At time of review, selective service verification was not provided by Region 10 staff. State team looked up the participant's registration on the online verification system, and the individual was not documented as registered.

Policy:

- Handbook- Section 11-Eligibility for WIA Title I Programs
 - Page 6. *If an individual who is required to register at age 18 turns 18 during his period of WIA enrollment, he must register in order to remain enrolled in the program. Failure to register must result in immediate termination from WIA program.*
- Handbook-Section 19-Title I Programs-Youth
 - Page 37. *In the following participant circumstances, the WIA worker can close all WIA activities and the participant will be exited automatically in 90 days unless the participant is receiving partner services:*
 - *For failure to comply with Section 3 of the Military Selective Service Act (i.e., submitting and registering for the draft as required).*

Corrective Action:

Region 10 staff will work with the individual to get him registered with selective services, thus allowing him to remain in Post-Program services. If the individual refuses to register, staff will close his post-program services for failure to comply with Title I programs selective service policy. Review selective service guidance which may be found in the handbook, Title I Programs-Adult & Dislocated Worker Services, with career planners and send verification of training no later than November 30, 2016.

Provider Response:

This student was contacted and has completed selective service. Documentation is being put in file and in casenotes. Training on selective service for youth turning 18 will be completed on August 24 with the WIOA Title 1 youth team. Documentation will be shared with the state. The team will also brainstorm ways to 'catch' when youth turns 18 in the future to ensure selective service is completed timely.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

6. Humpert/1090- Dislocated worker enrolled 5/14/13, still shows an open enrollment with all activities and services still open; no case note since 7/14/14; seeker services shows sporadic job internet job searches in late 2014, February of 2015 and as recently as 6/8/16.

Policy:

- Handbook-Version 2008; Section 14/Applicant Process (enrollment occurred 5/4/13)
 - Pages 8 & 9: *As additional relevant information about a participant becomes available, the objective assessment should be reviewed and re-evaluated. The participant should be re-assessed as necessary to determine further service strategies.*

Since the IEP is an on-going process, it must be reviewed and updated at least annually, as appropriate. This review must include an evaluation of the participant's progress in meeting the objectives of the IEP and the attainment of pre-employment/work maturity, basic education and occupational skills training, as well as the adequacy of the support services provided.

Corrective Action:

Assess status and result file. Close G&C after career-related guidance has been provided and re-open if necessary; update IEP and case note based on customer needs. Ensure all participants are provided meaningful contact at the minimum of every 90 days, and as a goal every 30 days. Provide career planners training on participant progress, Title 1 Programs – Adult and Dislocated Worker section of the handbook and send state team members verification of the training no later than November 30, 2016.

Provider Response:

Training on applicant processes will take place on August 24th with the WIOA Title 1 team. Documentation will be sent to the state. Consultants will complete a quarterly review of the caseload management report to ensure they understand training and are ensuring each participant on caseload is receiving services, enrolled in appropriate services, and is up to date with casenotes.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

7. Wayson/9447- Dislocated worker, reflected no post program via case notes after training completion 5/14/15.

Policy:

- Handbook- Section 14-Applicant and Participant Process
 - Page 11: *Follow-Up will be provided to those members exited as employed.*

Corrective Action:

Follow up services must be made available, as appropriate, for a minimum of 12 months following the first day of employment, to registered participants who are placed in unsubsidized employment and documented in the case file. Provide career planners training on participant progress and post program requirements, Title 1 Programs – Adult and Dislocated Worker section of the handbook and send state team members verification of the training no later than November 30, 2016.

Provider Response:

Same response as to finding 1: Training will be completed on August 24th on this topic with the WIOA Title 1 Team. Documentation of training will be sent to the state.

IWD Conclusion:

The finding remains unresolved pending notification of issuance of the policy guidance to local staff. Upon staff training, please send verification of the training, including a sign-in sheet of staff in attendance, to team no later than November 30, 2016.

The following *Observations* were determined:

1. Reviewer was provided self-attestation for barriers concerning two out of the five youth who were reviewed. Self-attestation is acceptable, however best practice for Iowa is to obtain hard copy documentation of eligibility elements.

The following *Strengths* were observed:

1. Co-enrolling participants with GAP/PACE program.

If you have questions, please contact Wendy Greenman at 641-782-2119 x 20 or via e-mail at: wendy.greenman@iwd.iowa.gov.

Sincerely,



Todd Spencer, WIOA State Administrator
Iowa Workforce Development



Wendy Greenman, Workforce Program Coordinator
Iowa Workforce Development

CC: Carla Andorf
Kelly Taylor
Jamie Swacker