



*Serving Employers and Job Seekers in
Butler, Cowley, Harper, Kingman, Sedgwick & Sumner Counties*

WIOA Subrecipient Cowley County Monitoring Summary

Prepared by
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June 1, 2022



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The Workforce Alliance Monitoring Department (WAMD) conducted a subrecipient compliance and performance review, in accordance with the Comprehensive Monitoring Guide (CMG), during the month of May 2022. This review targeted the provision of One Stop and WIOA services to the Cowley County area under the Cowley College (CC) contract running from January 2021-June 2022. The total number of unique jobseeker customers and unique business customers served by CC was unclear due to conflicting reports; please reference Attachment A for further information on these reports. As of the writing of this Monitoring Summary, the Monitor has not received the prior contract performance reports (shown in the contract) from CC to attempt to verify the numbers served for this period. These will be required before a contract renewal could be considered.

Monitoring was conducted to determine compliance with and effectiveness of core activity indicators for this program. The contract for the provision of Cowley Workforce Center Services between the Workforce Alliance of South Central Kansas (WA) and CC was examined and compared to the processes being implemented by program and contractor staff. A subrecipient site visit was conducted on May 12, 2022 at which a meeting took place between the following individuals:

Dawn Fanning, Workforce Alliance Compliance & Oversight Specialist
Michelle Schoon, Cowley College Vice President of Academic Affairs
Jennie Heersche, Cowley College Director of Workforce and Community Education
Greg Butler, Cowley College Workforce and Career Specialist

The WAMD Monitor coordinated with the Director of Integrated Employment Services, the One-Stop Operator, the Career Services Supervisor, the former Business Services Supervisor, and the Technical Assistance Specialist for Local Area IV to gather relevant reports, training logs, and other information regarding the performance of this contractor. These are located in Attachment B. The Monitor also pulled reports from the relevant databases including KansasWorks (KW)/Tableau, WaitWhile, and a Google Sheets tracking tool. CC provided copies of their monthly reports that they had submitted to the WA and the One-Stop Operator for 2022. Please reference Attachment C to review the reports provided by CC.

Following is a summary of the review process and any items requiring further attention.



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Policies, Procedures, and Protocols

CC utilizes their standard college policies and protocols for their Workforce Center service delivery. These can be found on their website: www.cowley.edu/policy/index.html

While this does ensure that they have the requisite policies in place regarding non-discrimination and anti-harassment, equal opportunity employment, the complaint process, and ADA access, it has not been customized to the provision of Workforce Center services. No protocols appear to have been created regarding the specific delivery of services relating to their contract with the WA, which the Monitor feels would be beneficial to the service delivery process.

The Monitor reviewed WA protocols and policies related to the delivery of Workforce Center services with CC staff and provided them with copies of these and identified where they could be found in the future. CC staff indicated that their Workforce and Career Specialist did attend WA new hire training at the beginning of the contract and that he was invited to Workforce Center Friday morning meetings initially, but that he stopped receiving these invitations after a few weeks. They stated that when they inquired with the One-Stop Operator about this, they were told that they could not be added to the distribution list for these because they did not have Workforce Alliance email addresses and that she would have to remember to add them manually each time. The Monitor communicated with the One-Stop Operator about this issue and requested that she figure out a way to be sure to include CC staff on future invitations.

CC reported occasional difficulty with receiving responses from a few WA staff and provided some information that conflicted with what was reported by the WA as far as training and interactions. TEGL 16-16 provides operational guidance for the American Job Center Network and emphasizes the importance of integration of partners and states:

“Through the American Job Centers, these partner programs and their direct service providers ensure businesses and all job seekers—a shared client base across the multiple programs—have access to information and services that lead to positive educational and employment outcomes.”

Furthermore, KW 5-22-00 requires that *“consistent service design is evident at all locations within the Local Area One-Stop System”*.

One other item of note was that while in the meeting on May 12, 2022, there appeared to be some confusion on who should be entering services into the KansasWorks database. The VP of Academic Affairs advised the Director of Workforce and Community Education that she did not want her entering anything into KW, as her primary role was in service to Cowley College and not as a representative of the Cowley Workforce Center. The Monitor clarified that if a staff



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person provides a service to a jobseeker customer or a business customer for the Workforce Centers, that person is the one who must document the service in the appropriate database. Because the Director of Workforce and Community Education is reporting the provision of services to businesses and some jobseeker customers on reports, she will need to be the one documenting these.

One Stop Services

The contract between the WA and CC specifies that the Cowley Workforce Center is to coordinate with the local One-Stop Operator to provide Workforce services. It appears to the Monitor that little has been done to this effect from either side. CC staff report receiving very little guidance or feedback from the One-Stop Operator, and the One-Stop Operator verified that she has had limited contact with CC staff. The One-Stop Operator should establish connections to get CC staff added to training and meeting distribution lists and would like to see further engagement and regular contact initiated going forward.

The contract for the One-Stop Provider for the period of July 1, 2021-June 30, 2024 states the following:

“The overall role of the One-Stop Operator is to provide continuous quality improvement of on-going functioning of the Local Area IV One-Stop delivery system and center(s). This includes but is not limited to supporting activities such as functional supervision, program co-enrollment, service integration in accordance with WIOA standards while implementing best practices.”

But, WA Leadership has directed the One Stop Operator to focus on the comprehensive workforce center in Wichita. WA Leadership should strike a balance and provide guidance to the One Stop Operator to ensure the One Stop Delivery system is functioning as expected by WIOA.

The following items are noted as areas of concern that should be addressed by WA Leadership in regards to this area:

- 1. The One-Stop Operator is not fulfilling its contractual and statutory obligations to ensure consistent service design and delivery at all locations in LAIV as directed by WA Leadership.**
- 2. The WA has not ensured that the One-Stop Operator and adequate guidance, communication, and oversight has been provided to CC in accordance with the contract.**



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Outreach, Recruitment, and Orientation

CC reported that they routinely host and attend Chamber of Commerce events throughout the county and have promotional materials that they offer to jobseekers; reference Attachment D to view the materials provided to the Monitor. They stated that they have a Facebook group for community and student jobseekers with over 140 members, and they have a page on their CC website with basic Workforce Centers information and a link to the Workforce Alliance website. It can be found here: <https://www.cowley.edu/training/workforce.html>

The LAIV Plan states the following:

“All matters involving promotion of the Workforce Center to external audiences must be reviewed first with the CM/PIO. This holds true for publicity being prepared by partner organizations for outside dissemination to the media and key external audiences.”

The Communications Manager (CM/PIO) for the WA stated that she has not received or been allowed to approve materials prior to their release by CC. She cited a specific press release issued by CCC on 2/16/21 for which she had requested that it be sent to her for approval, but she stated that this did not occur. The CM/PIO also stated that none of the promotional materials currently in use by CC were presented to her for approval and that branding requirements were often not being met on what she has seen released by CC. The press release referenced can be found here: [New Workforce and Career Center to offer services for job seekers and employers \(cowley.edu\)](#)

The CC web page for Cowley Workforce services has some errors and issues that were identified by the Monitor. The mission statement listed on the CC website is as follows:

“The Workforce Centers of South Central Kansas is a business-driven partnership that includes employers, educators and various community agencies. Its mission is to develop and lead a flexible, integrated workforce system that identifies and responds to the future business and employment needs of South Central Kansas.”

According to the WA website, the actual mission statement of the Workforce Centers is:
“Growing the regional economy through a skilled workforce.”

The address and hours listed for the Sumner Workforce Center are incorrect on their website. Their web page also states the following: *“Cowley College is actively involved in the Workforce Centers of South Central Kansas.”* The Monitor finds this statement to be confusing, as CC is actually the official Cowley County Workforce Center location awarded by contract and not merely a partner. The Monitor also noted that the services mentioned on the website seem to be



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mostly geared towards businesses and not jobseekers. The Monitor would like to see the full range of Workforce Center services outlined on the web page, along with the proper contacts for Workforce related grievances and complaints to be clearly provided.

CC stated that they regularly attend job fairs sponsored by Cowley First and have coordinated with Southwestern College and the WA to provide job fairs for the area. They reported that attendance for the job fair held with Southwestern was over 40 businesses and over 200 attendees. They report that a job fair held in September 2021 had over 20 businesses in attendance and 140 plus attendees. CC stated that they have a job fair planned through Cowley First for July 2022 and another job fair planned at CC in August.

CC stated that they have presented information about Workforce Center services four times along with employer partners to the Cowley Adult Basic Education program over the duration of the contract, with approximately 15 students in attendance per group. They also reported that they handed out Workforce pamphlets at the Arkalala Festival and the Cowley County Fair. CC stated that most of their interactions in Cowley are business driven and that they are in the beginning stages of developing some potential Registered Apprenticeship partnerships with area employers. CC indicated that they have encountered some frustration from local employers due to the lapse in Workforce services and contacts that occurred before they took over the provision of services. They stated that this has made some employers hesitant to work with the Workforce system again. They also indicated that many businesses have expressed the unwillingness or inability to engage in the paperwork and processes required to participate in Workforce Center sponsored training activities.

There has been some documented confusion created with employers at times who have sought the services of both CC and the Workforce Center. Upon comparing emails between an employer in Wichita and CC staff, the Monitor noted that staff failed to document their contacts with this employer and also did not refer the employer to the proper contact for Workforce Center services. The Employer Partnership Manager stated that she was able to meet with the employer and smooth things over once she was informed of the employer's frustration, but this type of situation should be avoided in the future. The Monitor feels that further training and oversight of CC staff is necessary to prevent future incidents such as this.

CC reported that the WA has made several requests that they submit jobs for the KWCH job partnership that is in place in Wichita. However, CC stated that there are several reasons why this is not a good strategy for their area. It was stated that most individuals in Cowley County do not receive a KWCH broadcast, and primarily have access to KAKE and KSN. It was also reported that the KWCH job postings require that companies provide a salary range and most employers in Cowley are not willing to list this. CC reported that these factors make area companies in their area less interested in having their jobs advertised on KWCH. They suggested



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that a similar partnership with KAKE and or KSN might be more appropriate for their audience, particularly if it did not require a salary estimate.

CC stated that having a written narrative of the benefits of Workforce Center services for rural America would be helpful. The Monitor has provided some research resources as Attachments E & F to this report for possible consideration towards this end. It should be noted that the research found was conducted and released pre-pandemic, so more current research gathering would be recommended.

CC stated that their primary jobseeker traffic has been Cowley area individuals seeking assistance with the MyRE program and unemployment. They pointed to the Cowley County unemployment rates being lower than those for Sedgwick County and the State of Kansas as reasons for limited jobseeker traffic and provided a printout of unemployment data from the Kansas Labor Information Center (KLIC) website, which is included as Attachment G.

CC staff stated that they receive a large number of phone calls for KW password resets by customers from across the State. CC relayed that because their city name (Arkansas City) shows up first alphabetically on the State KW page, they are frequently the first number that customers call for this service. CC staff stated that they assist customers with this issue, regardless of their location, but indicated that they have received calls from some Cowley customers who stated that they first called another area and were told they had to call the Cowley Workforce Center for assistance with that. The Monitor would like to see some clarification from the State on how these types of calls are to be handled and ensure the consistency of services to customers.

CC has expressed that they have received some interest by Cowley area employers for local WorkKeys testing options and stated that they are in the process of being certified by Pearson Vue. CC stated that they would like to pursue the potential for their staff conducting WorkKeys assessments in the near future. The Monitor passed this information along to WA staff for consideration.

CC reports that the majority of the jobseekers who visit the Cowley Workforce Center are lacking in computer skills and also indicate that they are uninterested in attending computer workshops. It was reported that most employers do require that job applications be completed online, but that jobseekers only want assistance with applying and do not express any interest in building their overall computer skills. The Monitor feels this would be another reason to further explore the research on effective methods of service delivery for rural areas, and also capitalize on existing partnerships that could assist with this issue.

The following findings were identified for this area:



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- 1. Documentation of services is not occurring consistently as per the requirements of the contract.**
- 2. Co-branding of materials and coordination with the WA prior to release is not in compliance with the requirements of the Local Plan and the contract.**

Basic Career Services Eligibility (BCSE)

Program eligibility is a critical step in providing services funded under the WIOA Title I Program. The Monitor conducted a review of both of the files that had been submitted for WIOA

BCSE eligibility from Cowley County; it should be noted that neither of these eligibilities were completed by CC staff and were instead referred to WA staff for completion. These customers are listed in Attachment G.

The CC Workforce and Career Specialist also reported that he only had access in the KansasWorks database to customers in Sumner County and not those in his own service area of Cowley County. CC reported that they had contacted various members of the WA staff and the One-Stop Operator numerous times to get this corrected, but to no avail. The Monitor spoke with WA staff about this and was advised that the Cowley College office had to be added to KansasWorks initially and so this is why they did not have access early on. However, they stated that they were unaware that they still did not have access to the correct office once this was corrected in KW. The Monitor emailed the Director of Training and Policy for the WA, and this issue was corrected in less than 24 hours. Without access to the correct customers for their area, CC staff would have experienced understandable difficulty in adequately serving these customers and completing eligibilities.

There was one finding for this area:

- 1. No program eligibilities have been completed by CC staff, which is not in accordance with the contract; only two program eligibilities were able to be identified by the Monitor for the time period of the contract, and these were referred to and completed by WA staff.**

One area of concern was identified in this process:

1. CC staff did not have access to the correct customer base in the KansasWorks database for nearly 18 months; WA staff failed to follow up on this issue, and CC staff did not continue to escalate this to the Vice President and Chief Operating Officer, who is listed as their primary point of contact listed on the contract.



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Individualized Career Services

The contract and WIOA regulations specify that Individualized Career Services (ICS) must be made available (but not necessarily provided) to all customers. The provision of ICS does require the completion of eligibility through the WIOA BCSE process. Because only two individuals in the Cowley service area were identified by the Monitor as having completed BCSE during the period of this contract, however, ICS had not been offered or provided to any customers in Cowley County.

The following finding was identified for this area:

- 1. It does not appear that the full scope of Workforce Center services is being offered to customers at the Cowley Workforce Center.**

Case Management

No case management services were provided by CC staff during the contract period. The contract states that the majority of Case Management is to be provided by WA staff, but that the delivery of these services should be coordinated with CC staff. Because so few jobseekers were processed for WIOA eligibility, no evidence of Case Management coordination was detected by the Monitor at this time.

Summary

Findings

The following were identified as findings by the WAMD:

- Co-branding of materials is not in compliance with the requirements of the Local Plan and the contract
- It appears that no program eligibilities have been completed by CC staff, which is not in accordance with the contract; only two program eligibilities were able to be identified by the Monitor for the time period of the contract, and these were referred to and completed by WA staff
- It does not appear that the full scope of Workforce Center services is being offered to customers at the Cowley Workforce Center



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Areas of Concern

The following areas of concern were identified by the WAMD:

- The One-Stop Operator does not appear to be fulfilling its contractual and statutory obligations to ensure consistent service design and delivery at all locations in LAIV
- The WA has failed to ensure that the One-Stop Operator and adequate guidance and communication is available to CC
- The issue with the lack of correct area access to the KW database should have been quickly identified by the WA and corrected; this further indicates a lack of adequate oversight
- The current outreach process for Cowley appears to need to be reviewed and updated
- The CC web page for Workforce Center services is unclear and contains errors
- Clarification is needed from the State on how calls are to be handled to ensure the consistency of services to customers
- Clear written guidance for expectations and reporting requirements appears to be lacking
- General communication and coordination between CC and WA require improvement
- CC is not utilizing all of the resources that have been provided to them

Best Practices

The following items were identified as best practices:

- CC has developed a good working relationship with the RES team in Wichita
- WA & KDOC Career Center supervisors and the former Business Team Supervisor were reported by CC as being fairly responsive to requests
- Many useful resources and protocols were identified for the provision of both Career Center Services and Business Services
- WA provided CC with most of the same training resources and information that was presented to the staff in all of LAIV

Recommendations

- The Monitor recommends that the CC website be reviewed for clarity of purpose and accuracy. It is also recommended that they add clearer links to the Local Area IV policies such as the Grievance and Complaint Policy and the EEO Statement on their website, since these are the official points of contacts for any complaints of this nature.
- CC should consider developing protocols regarding the specific delivery of services relating to their contract with the WA.



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- It is suggested that WA management staff and the One-Stop Operator review the requirements in TEGE 16-16 and coordinate with CC staff to enhance Workforce Center services in Cowley County and ensure that they are consistent with those offered in other LAIV Centers.
- It is also suggested that the WA promptly develop further written guidance and protocols for providing services in a rural area, how to prepare monthly reports (create reporting templates), with whom to communicate concerns by title, the process for escalating issues if they are not resolved, and anything else that might be useful to establish consistent and quality services for all local Workforce Centers.
- WA representatives should conduct routine visits to the Cowley Workforce Center to provide guidance and training as needed, and to monitor operations there. This should occur at a minimum of twice per year.
- Have CC staff come to work out of the Wichita Workforce Center once per month for more practice and to ensure consistent customer interactions.
- The Monitor recommends that any future contract for Cowley Workforce services specifies that whichever staff provides a service is required to document that service. She also suggests that the contract specify a percentage of meetings and trainings that should be attended by contractor staff during the contract period, and ensure that these meetings and trainings are accessible.
- Explore creative ways to engage rural jobseekers in workshops and partner for increased offerings.
- Due to the discrepancies in communication between agencies, it is suggested that all correspondence between CC, the One-Stop Operator, and the WA be confirmed in writing and saved for future reference.

As the Local Workforce Development Board (LWDB) for Local Area IV, the Workforce Alliance of South-Central Kansas (WA) places a high priority on proper implementation of the Workforce Innovation and Opportunity Act (WIOA), and approach the internal monitoring report recently conducted by the Workforce Alliance Monitoring Department (WAMD) as an opportunity for continuous improvement. The information provided in the report is helpful and clearly does point out some a consistent theme of communication being the biggest issue highlighted in the audit.

The responses below summarize actions to be taken that will enhance operations, and will help to resolve the findings. The corrective action plan will be completed no later than August 31, 2022.

Findings/Areas of Concern and Actions:

1. Finding: Co-branding of materials is not in compliance with the requirements of the Local Plan and the contract
 - a. Needs a Response- Response: CC will meet with communications staff of WA to get an understanding of the co-branding requirements and expectations. New materials will be submitted by CC to WA for review before publication until requirements are understood.
 - i. **Resolution: A meeting was held on 8/19 to highlight areas of opportunity both on flyers and the CC website. CC is transitioning to a new website so changes will be implemented now and when the site migrates to the new platform. CC staff will seek approval from WA communications staff prior to send any flyers out in the future.**
2. Area of Concern: The CC web page for Workforce Center services is unclear and contains errors
 - a. Response: CC has already worked to address the discrepancies on the webpage as mentioned are being addressed based on the suggestions made in the summary report. WA will also set a meeting with WA Communications staff to review the CC website and co-branded materials to make sure it is consistent and accurate with all other LAIV sites and communication materials. Including links to the Local Area IV policies, specifically the Grievance and Complaint Policy and the EEO Statement on their website.
 - i. **Resolution: A meeting was held on 8/19 to highlight areas of opportunity both on the flyers and the CC website. CC is transitioning to a new site so changes will be implemented now and when the site migrates to the new platform.**
3. Finding- It appears that no program eligibilities have been completed by CC staff, which is not in accordance with the contract; only two program eligibilities were able to be



identified by the Monitor for the time period of the contract, and these were referred to and completed by WA staff

Response:

- a. Schedule CC staff to work out of the Wichita Workforce Center once per month for more practice and to ensure consistent customer interactions.
 - i. **Resolution: CC staff will work from the Wichita office every second Tuesday of the month starting 9/13.**
 - b. Communicate more thoroughly applicable staff meetings and trainings to grow the knowledge of CC staff and enhance services to the CC community.
 - i. **Resolution: OSO has created a more robust distribution list that incorporates CC staff for consistent communication of meetings and trainings. CC staff will also utilize the WA intranet and saved trainings to review any topics that they did not receive prior communication about trainings they may have missed.**
 - c. Continue bi-weekly Auxiliary office zoom meetings to communicate any changes, updates or needs that CC might have.
 - i. **Resolution: Will continue bi-weekly meetings on the 1st and 3rd Thursdays of the month.**
 - d. Explore creative ways to engage rural jobseekers in workshops and partner for increased offerings.
 - i. **Resolution: WA, CC and OSO met on 8/22 to strategies new ways to engage the general public as well as the employer customer. Follow up meeting to assess the success is scheduled for 9/19.**
 - e. Coordinate with CC staff to enhance Workforce Center services in Cowley County and ensure that they are consistent with those offered in other LAIV Centers.
 - i. **Resolution: WA, CC and OSO met on 8/22 to strategies new ways to engage the general public as well as the employer customer. Follow up meeting to assess the success is scheduled for 9/19.**
 - f. Jointly strategize procedures for providing services in a rural area. Including but not limited to Workkeys availability and facilitation.
 - i. **Resolution: WA, CC and OSO met on 8/22 to strategies new ways to engage the general public as well as the employer customer. Follow up meeting to assess the success is scheduled for 9/19. In the month of September CC will begin to facilitate Workkeys sessions that will be remotely proctored by the Wichita office.**
4. Finding- It does not appear that the full scope of Workforce Center services is being offered to customers at the Cowley Workforce Center

Response:

- a. Establish at least a bi-monthly visit schedule with CC to provide guidance and training as needed, and to monitor operations.



7. Area of Concern- The issue with the lack of correct area access to the KW database should have been quickly identified by the WA and corrected; this further indicates a lack of adequate oversight

Response:

- a. WA has submitted a request to AJLA in order to give CC the correct access in KW.
 - i. **Resolved by AJLA after the audit was conduct. Exact date unknown.**
 - b. Establish a process for escalating issues if they are not resolved, and anything else that might be useful to establish consistent and quality services for all local Workforce Centers including creating a communication contact list for concerns by title
 - i. **Resolution: Comprehensive list was provided and approved by CC on 8/24/22.**
8. Area of Concern- The current outreach process for Cowley appears to need to be reviewed and updated
- a. WA and CC will collaborate and establish outreach strategies and messaging to jobseekers and employers to increase participation from both customer groups.
 - i. **WA, CC and OSO met on 8/22/22 to strategies new ways to engage the general public as well as the employer customer. Follow up meeting to assess the success is scheduled for 9/19/22.**
 - b. WA and project management staff will work specifically with CC staff on outreach strategies to connect with qualifying OJT businesses in Cowley County.
 - i. **Resolution: CC has reached as of the week of 8/22/22 to strategize plan to meet qualified companies for the One Workforce Grant**
9. Area of Concern-Clarification is needed from the State on how calls are to be handled to ensure the consistency of services to customers

Response:

- a. Clarification will be provided by the Department of Commerce as to the handling of calls statewide so that there is more consistency with messaging and services provided to customers across the state.
 - i. **Resolution: Guidance provided on 8/17 from State Operations Director.**
10. Area of Concern- Clear written guidance for expectations and reporting requirements appears to be lacking.

Response:

- a. CC will follow reporting guidelines that have been made clear on how to submit monthly reports. If further clarification is needed CC will reach out to WA.
- b. WA will create a reporting template along with reporting timelines and reporting contact list to be shared with CC to support consistent messaging and reporting in board meetings.



- i. **Resolution: OSO and Direct of Integrated Employment services provided a new template and guidance on 8/25/22.**

11. Area of Concern- General communication and coordination between CC and WA require improvement

Response:

- a. Through bi-weekly zoom meetings and bi-monthly in-person visits and with specified process for escalating issues will enhance the communication and collaboration between CC and the WA.
 - i. **Resolution: Will continue bi-weekly meetings on the 1st and 3rd Thursdays of the month**

DRAFT