



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

WIOA Youth CPRF Contract & Youth Program Monitoring Summary

Prepared by
Dawn Fanning

July 1, 2024



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

The Workforce Alliance Monitoring Department (WAMD) conducted a comprehensive program review, in accordance with the Comprehensive Monitoring Guide (CMG), during the months of April-June 2024. This review targeted the provision of WIOA Youth Program services under the current Cerebral Palsy Research Foundation (CPRF) contract running from August 15, 2023-June 30, 2024, as well as the overall WIOA Youth Program operated by the Workforce Alliance of South Central Kansas (WA). CPRF has been providing contracted WIOA Youth Services since January 1, 2021. A total of 105 youth have been enrolled into the WIOA Youth Program thus far for PY23. Of these, 25 were reported as being active recipients of services provided by WA staff, and 21 were being served by CPRF during the monitoring timeframe of PY23; please reference Attachments A & B for further information on these customers.

Monitoring was conducted to determine compliance with and effectiveness of core activity indicators for this program. The contract between the Workforce Alliance of South Central Kansas (WA) and CPRF was examined and compared to the processes being implemented by program and contractor staff. A contractor site visit was conducted on April 22, 2024 at which a meeting took place between the following individuals:

Dawn Fanning, Workforce Alliance Compliance & Oversight Specialist
Janis Krohe, CPRF Vice President of Employment Services
Nick Blomberg, CPRF Director of Job Placement
Valarie Florio, CPRF Employment Services

After this initial meeting, a CPRF staff member was interviewed about their experience working with the WIOA Youth Career Specialist. This staff member displayed a good knowledge of program operations and services and indicated that they had been provided with adequate training and support for their position.

The Youth Program Manager, KC Schumacher, was interviewed on May 6, 2024 by WAMD staff Dawn Fanning and Janet Sutton. A Youth Program staff member was also interviewed immediately following this meeting.

Following is a summary of the review process and any items requiring further attention or meriting recognition as best practices.

Outreach, Recruitment, and Orientation

CPRF provided a copy of their internal Outreach Process Overview. They reported that they are still doing the majority of outreach and recruitment for the clients they are serving under WIOA, but they are receiving more referrals from WA staff and they feel this process has been greatly improved since the last monitoring review. CPRF reports that outreach includes, but is not limited to, routinely attending informational meetings with transition specialists, coordinating

with area school districts and Special Education counselors, attending job and resource fairs, holding open houses at CPRF, and fielding cold calls from interested parents and youth.

CPRF primarily serves clients with disabilities, but they are open to all WIOA Youth referrals. If clients do not require any of the WIOA contracted services offered by CPRF, then they are assigned to a WA staff person rather than to CPRF.

The referrals to CPRF and the Youth Program appear to be tracked more accurately than at the last review completed in March 2022. Outreach hours by CPRF are tracked on an Outreach Activity Tracking MS Excel spreadsheet and then billed to the WIOA Youth Program on a monthly basis.

Based on this information, the WAMD has no concerns about outreach at this time.

WIOA Youth Program Eligibility and Enrollment

Program eligibility is a critical step in providing services funded under the WIOA Title I Program. The Monitor conducted comprehensive reviews of 8 files of individuals who were receiving WIOA Youth Program services during the monitoring timeframe; these clients are listed in Attachment A.

CPRF or WA staff meet with youth clients to determine suitability and collect all required eligibility documentation. Paper files are kept and secured at the CPRF offices for clients applying through them, and electronic files are submitted through M-Files, where they are then reviewed by the WA Youth Program Manager and either approved, sent back for corrections, or denied. M-Files notifies CPRF staff or WA staff of the status of these files, or they have access to check their progress at any time. This is a huge improvement over the prior system of using Dropbox to submit files and has eliminated the delays in processing files for eligibility. The Youth Program Manager then assigns the files out to one of the WA staff to be scheduled for an Objective Assessment appointment.

During the file review, no findings were noted for eligibility. However, there were a few areas of concern noted.

1. For the enrollment process, the paperwork has been streamlined and packaged together to make it easier for applicants to sign all required documents at once. While this is good, it does appear that the Customer Photograph/Video Consent Form has been dropped from the collection, as well as the Youth Pre-Enrollment Assessment form. While the Photo/Video Consent is not a required form, it used to be included with the enrollment forms to ensure that youth were not inadvertently used in promotional materials without

their consent. The Youth Pre-Enrollment Form is a requirement listed on the WA Youth Program Intake Protocol. If the program staff believe that this form no longer serves a valid purpose for enrollment, then they should request that the existing protocol be updated to reflect that. None of the reviewed files had this form in them during this review.

2. One other concern noted with this sample of files is that the enrollment case notes do not clearly document the applicant's need for WIOA assistance to obtain self-sufficiency. In the past, a standard statement was used in all enrollment case notes to ensure that this occurred, and it was included in the Youth Enrollment Case Note Template. This seems to have disappeared from the current template. The WAMD would recommend adding this back in to ensure that auditors do not question the suitability of any applicants for WIOA Youth services.

The one problem that arose to the level of a finding with the enrollment process was as follows:

3. On one file, the Client Status Sheet was not actually signed by the client and the staff had the client sign a single unattached page with only the signature line. There were also many omissions on the actual unsigned CSS. There is no way to prove that the signed page is connected to the unsigned CSS in this file, which means that this client did not actually attest to the accuracy of the data entered into KW. This is not in alignment with the Youth Intake Protocol.

Objective Assessment (OA) and Individual Service Strategy (ISS)

WA staff contact the eligible youth applicants and schedule a meeting to complete the OA and ISS. During the OA/ISS meeting, WA staff meet with clients and conduct an initial assessment of their academic skills, basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, mental health support needs, and developmental needs. Using this information, an initial ISS is developed by the WA staff.

Once this meeting has been completed, a voucher is sent to CPRF by WA staff advising them of what Youth Program Elements they are authorized to provide to that specific youth client. WA staff open services and create budgets in KW according to what is requested by CPRF staff as the clients are progressing in the program. All of these requests are submitted and approved through M-Files and documented in KW. There was one finding for the OA/ISS process:

4. During the file review, the same file mentioned above had several issues with the OA/ISS. Once again, the full OA/ISS document was separate from the signature page, making it unclear if the client was actually signing off on the completed form.

Youth Elements

The following are the WIOA Youth Program elements that must be made available to all eligible program participants and provided based on need and the results of their OA/ISS:

- Tutoring, Study Skills Training, Instruction, and Dropout Prevention
- Alternative Secondary School and Dropout Recovery
- Paid and Unpaid Work Experience
- Occupational Skills Training
- Education Offered Concurrently with Workforce Preparation
- Postsecondary Preparation and Transition Activities
- Leadership Development
- Supportive Services
- Adult Mentoring
- Comprehensive Guidance and Counseling
- Entrepreneurial Skills Training
- Financial Literacy Education
- Labor Market Information
- Follow Up Services

After the OA and ISS are developed for the client by the WA staff, CPRF provide case management services for those clients assigned to them, and WA staff provide case management to those clients not assigned to CPRF. This is also when clients begin receiving any approved program elements according to what was indicated on their initial OA/ISS.

Case Managers (CMs) create a plan for overcoming any identified barriers on their OA/IS with the client and gather any documentation required for supportive service assistance requests. The following finding was noted with this process:

5. For one file, the initial OA/ISS created on 2/23/22 did not document a need for subsistence assistance under supportive services, and yet these were provided to this client without completing a new OA/ISS. Instead, the staff person modified the original OA/ISS in May 2022 and again in August 2022 with notes that they were adding rent assistance and then utility assistance after conversations with the client. This is not standard protocol, as a new OA/ISS is required to be completed as a client's needs change, and no services can be provided with WIOA funds unless they are supported by the OA.

CPRF staff appear to handle most of the clients seeking work experience services. According to program requirements, these participants are provided with work experience/job readiness training and any other useful preparatory services they require prior to being placed in a work

experience. The files reviewed during this monitor supported that this was happening according to regulatory requirements.

CPRF stated that they engage with area employers to place the client in a work experience that matches their interests and skills. Their staff coordinate with WA staff on this process whenever possible. CMs schedule job tours for the clients and attend these with them, providing support throughout the process. CPRF stated that they conduct weekly work site visits and support to the client during this time. These hours are billed under the Work Experience element.

There were several issues on the last monitoring review of CPRF that appear to have been corrected prior to this current review. CPRF appears to be properly billing services and being paid more promptly for services provided. They are also being allowed to be paid for follow up services as they provide them, so this has also been corrected from the last monitor.

The primary concern noted for the process of providing Youth Program elements is that although Local Area IV has approved providers for the element of comprehensive guidance and counseling, it is unclear that this is being offered when appropriate. Comprehensive guidance and counseling, as discussed in 20 CFR § 681.510, is individualized counseling to participants including drug and alcohol abuse counseling, mental health counseling, and referral to partner programs as appropriate. In TEGL 09-22 on page 3, the following is stated:

ETA strongly encourages integrating mental health assessments into the objective assessment process to identify potential mental health needs that must be addressed through mental health services or through referrals to mental health professionals for youth to be successful in the program.

None of the client files reviewed indicated a need for this element on their OA/ISS forms, but at least one of them should have had this element marked according to the client's documented circumstances just prior to applying to the program. According to this client's disability documentation, he had been discharged from the hospital for a suicide attempt and diagnosed with severe and persistent mental illness just a month prior to submitting eligibility for the WIOA Youth Program. However, neither the OA nor case notes address this and it does not appear that he was asked what supports he had in place to ensure his safety and stability. This leads the monitor to believe that this program element is not actually being offered to participants. This leads to the following finding:

6. All WIOA Youth Program elements are not being offered to participants in accordance with regulations.

Billing for Elements

CPRF submits itemized invoices for services rendered to the WA on a monthly basis, and also include an updated spreadsheet documenting the expenditures by category. This process was suffering from delays during the last monitor, but CPRF reports that this has been corrected. They now handle the work experience paperwork and the WA Program Manager has created a protocol that they report has made this process smoother, although it does require more work experience and case management hours on their part.

CPRF staff track all time on their MS Outlook calendars, which are color-coded by cost center. WIOA activities for each youth client are then documented in CPRF's Single Point of Entry (SPOE) database and in KW. Once data is entered in both SPOE and KW, the item is starred in the Outlook calendar indicating that the documentation is complete. Hourly employees log their total time worked each day in CPRF's company timeclock. At the end of a payroll period, each employee completes a Personnel Allocation Record (PAR) using their Outlook calendar to allocate their time to department cost centers and submit this to CPRF's Payroll Clerk. Actual hours billed to the WIOA Youth Program come from entries in CPRF's SPOE database.

WA staff enter case notes into KW only as services are provided and do not have to track their time spent. Based on all of this information, there were no areas of concern or findings for element billing at this review.

Case Management

CMs provide case management services to clients assigned to them throughout their participation in the WIOA Youth Program. Based on the files reviewed by the WAMD, CPRF staff typically have contact with their clients at least once a week and there is a clear description of services provided and actions taken in the case notes. CPRF staff appear to be actively engaging with youth clients and providing support throughout their services, as well as after they complete program participation.

WA staff provide co-case management on clients assigned to CPRF whenever they need elements not provided by CPRF, such as supportive services. Meetings occur between CPRF staff and WA staff every other week to discuss client progress and address any concerns that may arise. CPRF and WA staff report that this process is working well and they believe the coordination is helpful to serving youth clients.

WA staff provide case management services to youth clients not assigned to CPRF.

The other following contractual items were also discussed during these sessions.

The contract states that CPRF is required to attend at least one training regarding understanding, recognizing, and responding to the effects of trauma and mental health needs for clients. It also stated that 2 additional trainings would be offered on how to identify and access additional mental health resources for staff and participants. It was noted that the WA is still not offering any trainings related to this topic, but CPRF reports that they attend the Youth Mental Health First Aid training offered through KCSL and regularly seek out and attend trainings offered on the Workforce GPS website offered through the US Department of Labor, Employment and Training Administration. This results in the following finding:

7. WA is still not offering mental health services training to the contractor. Due to ETA's focus on mental health needs and the recognition that programs have not been addressing this adequately, the monitor recommends that the WA locate training resources to meet this contractual obligation and provide this training to their own staff as well.

The contract also requires that contractor staff attend staff development activities hosted by the WA. The WA Program Manager stated that CPRF is currently not being invited to any of these trainings. At the last monitor, they were being invited, but the offerings were determined as not being relevant to them and so they were choosing not to attend these trainings. The monitor suggests that if this requirement is not going to be offered/enforced, this should be removed from the contract.

Performance Tracking

CPRF is contractually required to utilize the KW data management system for the purposes of documenting client details that will affect performance. This includes the entry of individual participant data such as activities, case notes, outcomes and follow-up data. Timely data entry is required and must be entered within two (2) business days after the date of any individual activity. This requirement appears to be being met by CPRF by the timely entry of their case notes and services into the KW system.

CPRF is required to utilize KW and is responsible for meeting performance goals according to the State of Kansas and as outlined in the contract. CPRF still does not have access to the KW performance reporting system, so they utilize a WIOA Client Tracking Spreadsheet that lists the major activities/elements and their dates of completion, as well as the work experience start and end dates, hire dates, and exit to follow up data. This process appears to be working sufficiently at this time, although it is somewhat difficult to tell accurate performance details in KW due to a backlog of exit processing for the WA. The WA has one Exit Specialist who is responsible for processing the exits of all program files managed by the WA. This fact makes it difficult for performance to be accurately reflected in reports. Hence, the current performance reports for PY23 are attached, although these only reflect performance for files that have been exited in the KW system.

Summary

The following findings were identified by the WAMD:

- The completed Client Status Sheet was not actually signed by one client.
- The full OA/ISS document was not actually signed by one client.
- One file did not document a need for subsistence assistance under supportive services, and yet these were provided to this client without completing a new OA/ISS.
- All WIOA Youth Program elements are not being offered to participants in accordance with regulations.
- WA is still not offering mental health services training to the contractor in accordance with the contract requirements.

The following areas of concern were identified by the WAMD:

- The Customer Photograph/Video Consent Form and the Youth Pre-Enrollment Assessment form are not being completed by CMs and participants at enrollment.
- Enrollment case notes do not clearly document the applicant's need for WIOA assistance to obtain self-sufficiency.

The following items were identified as best practices:

- The accurate tracking of hours and services provided by CPRF is exceptional.
- CPRF has created many good internal processes and policies to support their work with the WIOA contract.
- WA has created more program guidance to clarify expectations and continues to do so.
- The coordination of case management and communication about cases is excellent.
- Job shadowing and coordination of support for work experience placements is happening frequently and is well documented.
- Client contacts are occurring often and are typically well documented.
- CPRF is reporting a high percentage of permanent job placements for clients at their work experience job sites. The cooperative relationships that CPRF has formed with youth work sites and area employers is a best practice.