

KANSAS DEPARTMENT OF COMMERCE  
REGULATORY COMPLIANCE UNIT  
LEGAL SERVICES



# WIOA MONITORING SUMMARY REPORT

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LWDA IV CASELOAD MANAGEMENT: TITLE I  
ADULT, DISLOCATED WORKER, AND YOUTH  
PROGRAMS

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MAY 2022

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REPORT # 22-04-01

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## EXECUTIVE SUMMARY

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In December 2021, the Commerce Regulatory Compliance Unit (CRC) of the Kansas Department of Commerce's (Commerce) Legal Division reviewed Workforce Innovation and Opportunity Act (WIOA) Title I Adult, Dislocated Worker, and Youth program caseload management policies and procedures in Local Workforce Development Area IV (LWDA IV) for compliance with Federal and State regulations. The Local Workforce Development Board (LWDB) has contracted with Workforce Alliance of South-Central Kansas to provide the local area with WIOA Adult, Dislocated Worker, and Youth services. The Workforce Alliance has workforce centers in Arkansas City, El Dorado, Wellington, and Wichita to serve the six counties that make up LWDA IV.

This executive summary details CRC's initial observations which were provided to Workforce Alliance (WA) Senior Administrators for response prior to summary report publications. Based on Workforce Alliance's responses below, CRC presents no findings, three areas of concern and three observations along with four best practices/program highlights.

### **Areas of Concern and Recommendations**

**Area of Concern 1:** Regarding the notification of Equal Opportunity (EO), 29 CFR 38.36 (4) states "Provided to each participant and employee; the notice must be made part of each employee's and participant's file. It must be a part of both paper and electronic files". CRC observed 2 files did not contained the required EEO notice.

**LWDA IV Response:** The local area responded by stating that "the issue has been discussed and covered with the case manager". Additionally, the local area stated "This customer originated with TAA and was co-enrolled with DW for supportive services. To reduce duplication of paperwork the TAA forms and releases are used."

- **Recommendation:** LWDA IV should consider adding an EEO checklist box to their "Program Individualized Career Services Eligibility" form under Additional Documents Required section.

**Area of Concern 2:** LWDA IV spent 9.4% of non-administrative Youth program funding on work experiences; they did not reach the minimum spending threshold of 20% set by 20 CFR 681.590<sup>1</sup>.

**LWDA IV Response:** "The WA has just completed a monitoring review of the youth program and is working on a corrective action plan to increase enrollments and work experience activity. Due to COVID and shutdowns, it was difficult to get youth work experiences. Work Experience spending in the current year has increased and we are currently exceeding the 20% requirement in the current year. The WA has also held some youth funds for PY20 back to use for Work Experience, to increase the work experience % spend of those funds."

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<sup>1</sup> <https://www.ecfr.gov/current/title-20/chapter-V/part-681>

- **Recommendation:** No recommendation at this time. CRC is satisfied LWDA IV is working on a action plan to increase youth enrollment and work experience activity. The USDOL’s Employment and Training Administration acknowledges the tremendous impact that COVID-19 is having on all states and local areas’ abilities to implement the WIOA program, in particular, to provide work experiences in person at a workplace.<sup>2</sup>

### Observations

**Observation 1:** CRC observed four of the ten Individualized Service Strategy (ISS) forms did not have information in the Barriers and the Services area which highlight how the participant will achieve the listed action step.

**LWDA IV Response:** “Upon reviewing the ISS forms it does appear that the rationale section was not completed on the 4 files listed. These were all completed by the same Case Manager, the Youth Program Supervisor will provide additional training to the case manager involved and ensure all Youth case managers are completing all the sections on the ISS. Additional training with staff should resolve this issue in the future.”

**Observation 2:** CRC observed an Adult file has case notes that the participant had achieved a recognized certificate/degree but no documentation of the certificate/degree is in the file.

**LWDA IV Response:** “This case note was based off the transcript from WSUTech showing the customer had completed the necessary courses for the certificate in Spring 2021. Case manager will reach out to school for official copy of certificate.”

**Observation 3:** CRC observed one Adult file in **KANSASWORKS** is missing case notes for the thirty-day contact/attempted contact note for multiple months before exit. CRC noted the Individual Employment Plan (IEP) signed by participants and case managers states, “Client will be required to MAINTAIN MONTHLY CONTACT WITH ASSIGNED WP.... The WP will process all paperwork in a timely manner and maintain contact with client and the training provider as needed.” In calendar year 2020 the following months had no contact/update notes for the months of February, April, June, November or December

**LWDA IV Response:** “The primary program for this participant was KHPOP and that is where the recent contact notes with the participant are in KW. Case manager had contact with the customer in July, August, September, and October of 2020 prior to the exit date in December 2020.”

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<sup>2</sup> [COVID-19 Frequently Asked Questions | U.S. Department of Labor \(dol.gov\)](https://www.dol.gov/ebsa/faq-covid-19)

## **Promising Practices and Program Highlights**

- Centers Industries Corporation of Wichita is a manufacturing plant that works with the Cerebral Palsy Research Foundation (CRFP) to provide full time employment with benefits for persons with disabilities. Centers Industries has a variety of jobs and environmental settings to accommodate different physical barriers and aptitudes. Since July of 2021, WA has placed five Youth participants in a work experience at Centers Industries and two have been hired on full time. A work experience at Centers Industries can be thought of as a working job interview, to see if the participant is a good fit for the company and if the company is a good fit for the participant.
- Trade Adjustment Assistance (TAA) Final Rule at 20 CFR 618.325 A state must co-enroll trade-affected workers who are eligible for WIOA's dislocated worker program. Workers may choose to decline co-enrollment in WIOA. Workforce Alliance developed a co-enrollment policy in 2021 to guide staff on how to integrate services per United States Department of Labor (USDOL) Training and Employment Guidance No. 04-20.
- LWDA IV had a 93% expenditure rate of non-administrative youth program funding spent on Out-of-School (OSY) target group.
- LWDA IV provides regular staff training for effective communication with persons with disabilities.

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## BACKGROUND

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The United States Congress enacted the Workforce Innovation and Opportunity Act (WIOA) to reform federal job training programs and strengthen the workforce investment system. The vision of WIOA is to have a collaborative effort between the Department of Labor (DOL), Education (ED) and Health and Human Services (HHS) deliver an integrated and job-driven workforce system linking the workforce to our nations businesses. Final WIOA rules were published in the Federal Register on August 19, 2016, to provide program implementation. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers needed to compete in the global economy. WIOA brings together and coordinates the core programs of Federal investment in skill development:

- Employment and training services for adults, dislocated workers, and youth and Wagner-Peyser employment services administered by the United States Department of Labor (USDOL) through formula grants to states.
- Adult education and literacy programs and Vocational Rehabilitation state grant programs administered by the United States Department of Education.
- Programs for specific populations, including the Job Corps, Youth Build, Indian and Native Americans, and Migrant and Seasonal Farmworker programs (MSFW) as well as evaluation and multistate projects administered by USDOL.

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## REVIEW SCOPE

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Commerce, the Governor's designated WIOA grant funds recipient, monitors five Kansas local workforce development areas (LWDA) for compliance with the Act's federal rules and regulations addressing program service provision, adherence to uniform administrative and audit requirements, and compliance with non-discrimination and equal opportunity provisions. Commerce's Regulatory Compliance Unit (CRC) completes this requirement through regular program and administrative reviews which may include any or all grant program administrative components. CRC documents monitoring results through summary reports disseminated for response and referenced during corrective action proceedings, if necessary. CRC reviews various documents to prepare for onsite reviews which may include but are not limited to:

- Workforce Innovation and Opportunity Act (WIOA) of 2014, Final Rules
- 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Previous monitoring reports and Training and Employment Guidance Letters (TEGL) issued by the U.S. Department of Labor Employment and Training Administration (USDOL/ETA), Commerce Regulatory Compliance Unit, or other independent entity
- Kansas Department of Commerce WIOA Policies and Procedures
- Local Area Workforce Development Plans and Policies and Procedures Manuals
- Sub-recipients submitted monthly fiscal and performance reports

## Entrance Conference

CRC conducted an on-site interview on Wednesday, December 8<sup>th</sup>, 2021 at the Workforce Center in Wichita Kansas. Chad Hagedorn and John Ybarra from CRC convened with Training and Policy Manager Denise Houston, the Adult/Dislocated Worker Training Program Supervisor Kelly Meier, and Youth Program Supervisor Stacey Cotton of Workforce Alliance to discuss WIOA program operations and trending economic conditions. CRC also had the opportunity to interviewed A/DW Case Manager Hope Ramirez, Youth Case Manager Jennifer Stoffel, and Business Service Representative Alejandro Angel about program operations. During the entrance conference, CRC toured the workforce center and observed WIOA's required one-stop partners<sup>3</sup> are staffed within the facility. Additionally, CRC joined Stacey Cotton for a youth worksite visit at Centers Industries, in Wichita Kansas. Along with the on-site visit, CRC was provided requested documents pertaining to WIOA performance goals, operation policies, service provider contracts, and participant files via Dropbox.

### A. WIOA Title I Youth Program

**Overview-** The WIOA Youth program serves two categories: In-School Youth (ISY) and Out-of-School Youth (OSY). WIOA rules prioritize funding expenditures on the OSY target group and providing work experience opportunities. As Workforce Alliance (WA) navigated through the economic conditions caused by the COVID 19 pandemic of early 2020, they experienced complications placing youth into work experiences. After PY19, WA found a need to reconfigure their service delivery model by seeking element providers that offer more than one of the required youth service elements. In PY20, WA entered a youth element service provider contract with Cerebral Palsy Research Foundation of Kansas (CPRF). CPRF will provide eight element services to the youth program. The youth program will be aided by the recently created Youth Employment Committee. In PY20, the youth program was able to meet or exceed five of the six negotiated Program Performance Measures.

**Applicant Outreach, Orientation, and Partner Referral Processes-** The Workforce Alliance performs participant outreach and recruitment activities through distribution of flyers and brochures at workforce centers, social media (Facebook, Twitter, and YouTube), distribution of information to area high schools, attending job fairs, and referrals from community organizations. The **KANSASWORKS.COM** moniker is prominently displayed on WA building signs, printed materials and their website. CRC was informed, once a month WA staff have meetings with partnering agencies to stay current with youth programs outside of WIOA and to promote WIOA services for participant referrals. Based on participant file documents and file notes, CRC observed referrals are received through a central location. Potential participant information and referring agency information are recorded on to standardized form and sent to a case manager for follow-up. For tracking purposes, the form has a section for the date the referral was received, the date the referral was assigned to the case manager, and if the referring agency would like a follow-up progress report.

- Through staff interviews, CRC learned WA consorts with a local news station, KWCH 12, to produce a youth job of the week segment. This highlights a job opening from the **KANSASWORKS** website and KWCH 12 post a link to the job posting at **KANSASWORKS.com** on their website.

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<sup>3</sup> <https://www.ecfr.gov/current/title-20/chapter-V/part-678/subpart-B/section-678.400>

**Eligibility Determination, Objective Assessment (OA) and Individual Service Strategy (ISS)**-Case managers meet initially with applicants to collect eligibility documents, complete enrollment paperwork, and explain diagnostic testing procedures. Applicants who do not meet eligibility requirements are referred to other partner programs. CRC observed in case file reviews, Workforce Alliance (WA) case managers use a checklist to verify all eligibility documentation has been submitted. The Youth Program Supervisor double checks documentation before approving eligibility. The Individual Service Strategies (ISS) is created by the case manager and the participant through an interview process to identify education and employment goals. The second part of the ISS describes the action steps needed to achieve the goal, what barriers the participant may have to complete the action step, what services are available to overcome the barrier, a due date for that action step and what documents will provide proof the action step has been completed. The ISS form states it shall be reviewed every six months, as goals are met, or as the participants circumstances change. The objective assessments (OA) details the participant's basic and occupational skills, prior work experience, interests, aptitudes, and supportive service needs to identify appropriate services and career pathways. Assessments provided include the Test for Adult Basic Education (TABE), Comprehensive Adult Student Assessment System Test (CASAS), Kansas Career Pipeline, O\*NET My Next Move Interest Profiler, Career Cluster Survey, Entrepreneurship Assessment, and ACT Career Ready 101 training. During file reviews, CRC observed WA uses the Workkeys test to assess a participant's readiness for training. The case manager will use the OA to define which of the fourteen elements the participant will need to achieve their goals.

- Of the 10 participant files CRC reviewed, nine of the files had ISS forms updated per local policy.
- CRC observed all ISSs were signed by the participant.
- Four of the ten ISS forms did not have information in the Barriers and the Services area which highlight how the participant will achieve the listed action step.

**Case Management and Youth Service Elements Provision**-Workforce Alliance utilizes the **KANSASWORKS** website to manage participant caseloads. **KANSASWORKS** allows case managers a central location to input demographic and assessment information, record monthly notes, have participants upload their resume and perform job searches, send job referrals to participants and participants can receive job posting alerts via email or text. WA staff assist all walk-in customers in creating a **KANSASWORKS** account to initiate service provision.

WIOA requires provisions of the following fourteen program elements:

- Tutoring, study skills training, instruction and dropout prevention services (ISY)
- Alternative secondary school services and dropout recovery services (OSY)
- Paid and unpaid work experiences
- Occupational skills training
- Education offered concurrently with workforce preparation and training
- Leadership development opportunities
- Supportive services
- Adult mentoring



- Follow-up services
- Comprehensive guidance and counseling
- Financial literacy education
- Entrepreneurial skills training
- Services that provide labor market information
- Post-secondary preparation and transition activities

LWDA IV utilizes a checklist format on their Objective Assessment form to ensure each element is offered to participants. The local area contracts with thirteen businesses to provide the services for each element. CRC reviewed each contract, the contract entails the scope of offered services, the cost of those services and the contract service term. All contracts were observed to have had valid term dates for the program year 2020. In August of 2020, Workforce Alliance publicized a Request for Proposal of services with the Secretary of State's Kansas Register (8/6/2020 publication date), a notice in The Wichita Eagle newspaper (7/31/2020 run date) and emailed or mailed the notice to twenty community organizations. This effort resulted in a service contract with the Cerebral Palsy Research Foundation; they provide services for eight of the elements. CRC interviewed staff which provided proficiency in knowing what the fourteen elements are and which youth providers offer the service.

**Work Experiences-**CRC reviewed local policy and participant files to examine youth Work Experience (WE) procedures. Workforce Alliance offer youth paid and unpaid WE year-round which may take place in the private for-profit, private non-profit or public sector. Participants are limited to 500 hours of WE during a calendar year. Compensation for the WE must meet prevailing wages for the occupation and not be lower than the federal minimum wage. The WE must involve the attainment of progressively more complex occupational skills. The Fair Labor Standards Act and Child Labor Laws must be adhered to when developing worksites. Workforce Alliance has 16 active worksites to place youth in work experiences. Prior to being placed in WE, the need of the WE must be documented in the ISS and participants will attend a work readiness orientation. Manpower Employment Services Inc. (Manpower) is the employer of record for the youth program work experience, but they are not the participant's work site supervisor. Manpower ensures youth are covered under a worker's compensation insurance plan and provides payroll management services. Work site supervisors review and sign participant timesheets weekly before forwarding them to Manpower. Worksite safety training for each youth will be required and must be documented.

- Of the ten youth files reviewed, CRC observed four had a Work Experience plan. All four had the need for WE documented in the Objective Assessment. Three files had WorkReadiness class scheduled according to the Work Experience element plan but only one file had a certificate indicating the orientation had been completed. One participant, because of where they lived, was exempted from the orientation requirement and was allowed to take the orientation during their WE.
- During file reviews, CRC observed a participant had a workplace accident. The file notes displayed clear communication between Workforce Alliance staff, Manpower, and the work site supervisor to identify the severity of the injury and if any other medical treatment would be necessary.

**Work Experience and Out-of-School Youth (OSY) Expenditure Requirements-** Federal regulation 20 CFR Part 681.590<sup>4</sup> requires WIOA youth programs expend not less than 20 percent of funds allocated to provide youth with paid and unpaid work experiences. CRC reviewed the **KANSASWORKS** State Board PY 2020 4<sup>th</sup> quarter quarterly expenditure report and WA only expended 9.4% on youth work

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<sup>4</sup> <https://www.ecfr.gov/current/title-20/chapter-V/part-681/subpart-C/section-681.590>

experiences. During staff interviews, the Youth Program Supervisor admitted the area was having a difficult time during the COVID-19 pandemic to place youth in work experiences. The new youth service provider contract with CFRP should improve the area's ability to meet the required minimum spending on WE. CFRP has a sister company, Centers Industries, that will be used as a youth works site.

- Since July 2021, WA has placed five youth participants in a work experience at Centers Ind. Two of those participants were hired full time with benefits after their work experience.

20 CFR 681.410<sup>5</sup> increased the minimum OSY expenditure rate for the youth formula-funded program from 30 percent, under the previous WIA law, to 75 percent under WIOA law. CRC reviewed the Workforce Alliance of South Central Kansas Inc. PY 2020 Statement of Financial Position for total Youth program spending and the OSY spending. Total youth expenditures were \$520,798.23 and OSY expenditures were \$486,894.08, WA had a 93% expenditure rate on the OSY target group.

**Supportive Services and Incentives-** Local policy states supportive services are available when necessary for the client to participate in WIOA employment and training activities and the participant must be in compliance with all aspects of their service plan. LWDA IV offers supportive services for transportation cost, childcare assistance, employment related expenses, and subsistence. During file reviews, CRC noted three participants received supportive services. All required documentation, per local policy, was present in the participant's case files. Before supportive services are administered, the request must be approved by the program supervisor. CRC observed requests forms were approved and signed by the program supervisor.

Incentives for the Youth program are to reward participants who complete milestones in educational levels or occupational skills training. Documented proof of any achievement must be provided to WA staff within 60 days of achievement to be eligible for the incentive payment. Of the ten participant files reviewed, four participants had earned an incentive payment. To verify approval of an incentive payment, the program supervisor, fiscal administrator, and administrative/technical assistant review verifying documentation. All participants that received incentive payments had the proper documentation in their files.

**Program Exit and Follow-up Services-** Participants are exited from the program when no services funded by WIOA or by a partner program are received for 90 consecutive days, with no gaps in service and are not scheduled for future services. The exit date is applied retroactively to the last day the individual received services. Case managers submit a Closure of Service form to the exit specialist to transfer the responsibility of primary case tracking. After program exit, exit specialist request employment information from the participant via a recent pay stub. Exit specialist also input a participant's marginal skill gain(s) and the exit questions in **KANSASWORKS**. Follow-up services are offered to participants for twelve months after the exit date. CRC observed, in case notes, WA staff would ask participants if they would like to receive follow-up services and request the participant's employment information.

**Participant File Reviews-** CRC reviewed 10 randomly selected youth participant files to review, provided by WA via Dropbox. Documentation records are kept electronically within the Workforce Alliance and on **KANSASWORKS.com**. CRC observed the files contained the following documentation: participant signed Equal Opportunity notice and Grievance notice, case manager and supervisor signed eligibility checklist forms, an Individual Service Strategies signed by participants, an objective assessment, signed **KANSASWORKS** demographics information page. CRC verified that eligibility requirements including age, low-income status, and identifiable barriers were documented in compliance

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<sup>5</sup> <https://www.ecfr.gov/current/title-20/chapter-V/part-681/subpart-C/section-681.410>

with applicable locale, state and federal policies. Participants that received training have in their file: an career interest profiler, screen shot of **KANSASWORKS** showing the training provider is on the Eligible Training Provider list, a Workkeys test with a passing score, local job market information on the chosen career training, budget obligations and budget de-obligations when necessary.

**Local Monitoring Procedures-**A description of the local monitoring process for the youth program is found in section B. of this summary report.

**WIOA Title I Youth and Adult/Dislocated Worker Program Performance Measures  
PY 2020 (July 1, 2020 to June 30, 2021)- KANSASWORKS State Board**

Indicator/Program	Title I Adults	Title I DW	Title I Youth	Average Indicator Score
Employment 2 <sup>nd</sup> Quarter after Exit	86.00%	87.96%	115.86%	96.61%
Employment 4 <sup>th</sup> Quarter after Exit	84.04%	100.09%	106.82%	96.98 %
Median Earnings 2 <sup>nd</sup> Quarter after Exit	101.16%	111.83%	63.63%	92.20%
Credential Attainment Rate	101.88%	84.82%	121.07%	102.59%
Measurable Skill Gains*	145.67%	114.00%	130.20%	129.95%
Average Program Score	93.27%	96.17%	101.84%	

\* Measurable Skill Gains percentage is not used yet by the KW State Board when calculating Average Program Score.

Green boxes are exceeding goals

Yellow boxes are within acceptable range

Red boxes are area of improvement

- **Observation:** LWDA IV met or exceeded 66% of the WIOA negotiated performance level goals and was within an acceptable percentage range of all other negotiated goals.

**Youth Program Committee-** While not required under WIOA rules, LWDA IV created a Youth Employment Committee in January 2021 as part of the local areas 2020-2022 Strategic Plan. The goal is to enhance youth employment opportunities by expanding Workforce Alliance’s partnerships with businesses, schools, and other community organizations. The eleven-member committee represents persons in the education sector, business community, and non-profit organizations. The committee has a standing schedule to meet the third Tuesday of every other month.

**Equal Opportunity/Non-Discrimination Notices-** 29 CFR 38.36 (4) states “*Provided to each participant and employee; the notice must be made part of each employee’s and participant’s file. It must be a part of both paper and electronic files*”. At enrollment, all youth and adult/dislocated worker participants receive and sign the grievance and complaint notice and the equal opportunity/non-discrimination notice. These notices are maintained in the participants case file. Case managers provide accident reporting

procedures to participants and worksite supervisors prior to work experience assignment. CRC noted no grievances, complaints, or accidents, have been reported to the programs during the review period.

- During file reviews, CRC observed that two of the twenty files did not contained the required EO notice.

**Participant Success Story-** During the COVID pandemic, a youth lost her mother and found herself homeless as her and her five siblings had to now live with her aunt. During high school, the participant worked as a housekeeper making \$9.50/hr. She wanted to be a nurse and heard about the services at Workforce Alliance through a friend. As a homeless youth she qualified for WIOA services. WIOA paid for her CNA and CMA training where she earned two industry recognized certificates. After training, she was hired on full-time as a dedication technician making \$13.50/hr. She now lives on her own working full time in the healthcare industry earning \$17.05/hr. with health benefits while she continues school for her LPN certificate. See attachment # for more youth success stories.

“I really want to thank all of you guys over there! You will never understand how much I appreciate everything that you all have done. It has helped me make a huge transition in my life and has opened doors to my future that I had not even thought of before. A true blessing!” -participant.

## **B. WIOA Title I Adult and Dislocated Worker Programs**

**Overview-**LWDA IV is comprised of six counties in the south-central area of the state: Butler, Cowley, Harper, Kingman, Sedgwick and Sumner. The Chief Elected Officials (CEO) of each county appointed 32 members to the Local Workforce Development Board (LWDB). The Board composition complies with 20 CFR 679.320<sup>6</sup> and WIOA sec 107 (b)(2) by having eighteen representatives from the local business industry, one from adult education, seven from local labor organizations and one from Community Service Block Grant. The local board selected Workforce Alliance of South-Central Kansas (WA) to operate the area’s one-stop centers. Area IV’s main American Job Center is located in the city of Wichita in Sedgwick Co. and operates three satellite locations in Butler Co., Cowley Co. and Sumner Co.

LWDA IV’s main industries are manufacturing and agriculture. Aviation manufacturing and the Health Care industry are the most Board approved occupations for training available. The IT field and energy sector have the third most approved occupations for training. In PY20, LWDA IV was dealing with two catastrophic economic events. March 2019 the Boeing 737 Max was grounded for almost two years, having a local impact of an estimated 9,000 layoffs or furloughs. The other event was the COVID-19 pandemic; by the start of PY20 Area IV had 45,000 layoffs or furloughs; at this point Sedgwick county had the most unemployment claimants in the state. This led to DW and TAA participants being the main customer to access the workforce center. In PY20, Area IV received seven percent less WIOA funding from the previous year. The Workforce Alliance also solicits other funding sources, WIOA made up twenty-nine percent of the PY20 budget.

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<sup>6</sup> <https://www.ecfr.gov/current/title-20/chapter-V/part-679/subpart-C/section-679.320>

**Applicant Outreach, Recruitment, Orientation, and Partner Referral Processes-** CRC learned walk-in customers, referrals from past participants, Rapid Response events, Re-employment Services participants, and attending job fairs provide participants to the workforce center. WA also performs outreach and recruitment for WIOA services through their website and social media sites - Facebook, Twitter, and YouTube. In PY20, WA began a collaboration with a local news station (KWCH 12) on a series that will highlight a job posting from **KANSASWORKS** on the newscast. Links to the job posting at **KANSASWORKS** can be found on the KWCH 12 website under the Job of the Day banner. Workforce Alliance (WA) has regular staff meetings with partnering agencies and community groups to exchange information on current available services. In-take staff greet walk-in customers, gather demographic information, assist with **KANSASWORKS** registration and job service enrollment. Based on the demographic information and the participant's service need, a referral form is sent to the appropriate agency. CRC observed during file reviews, referral forms to and from the WIOA partnering programs located within the workforce center.

Since the closure of offices, due to the COVID 19 pandemic in early 2020, WA has been providing WIOA program virtual orientations to participants weekly on Tuesday mornings. TAA Final Rule 20 CFR 618.325 *A state must co-enroll trade-affected workers who are eligible for WIOA's dislocated worker program. Workers may choose to decline co-enrollment in WIOA.* In PY20, the LWDB approved a Co-Enrollment Policy to direct case managers when co-enrollment is appropriate and how to coordinate services between the two programs.

- Three of the five DW participant files reviewed were co-enrolled in the TAA program, one DW participant was not eligible for TAA assistance.

### **Eligibility Determination, Objective Assessment (OA) and Individual Employment Plan (IEP)**

**Development-** To be eligible to receive WIOA Adult and Dislocated Worker (A/DW) services the participant must be age 18 or older, legally eligible to work in the United States, and compliant with Selective Service requirements (males only). LWDA IV follows the United States Department of Labor Employment and Training Administration (USDOL/ETA) guidelines found in WIOA TEGL 3-15 which states priority must be provided to a group of individuals in this order:

- Veterans and eligible spouses who are recipients of public assistance, other low-income individuals or individuals who are basic skills deficient (BSD).
- Non-covered persons (individuals who are not veterans or covered spouses) who are recipients of public assistance, other low-income individuals, or individuals who are BSD.
- Veterans and eligible spouses who are not low-income or BSD.
- Non-covered persons who are not low-income or BSD.

Case managers initially meet with A/DW participants to gather demographic information and eligibility verifying documentation and sign enrollment forms. CRC observed during file reviews, program supervisors use a checklist form to verify all appropriate eligibility documentation has been received before approving eligibility. Per the **KANSASWORKS** State Board performance report, 95% of participants served in LWDA IV had employment barriers in the highest non-veteran priority group.

CRC learned from staff interviews, case managers formulate an objective assessment of the participant through demographic information and initial conversations to assess training needs and barriers to

employment. The IEP is developed between the case manager and the participant to outline a participant's occupational interest and occupation information research, justification for educational and vocational goals, plan for overcoming barriers, and supportive service needs. IEPs are updated every six months or when the participant's situation changes.

- During file reviews, CRC observed all participant files contained a signed IEP outlining the participant's occupational goals, their employment strengths, barriers to employment and how to overcome, and responsibilities of the participant and agency.

**Case Management and Career Planning-**Local case management practices include the development of Individual Employment Plan (IEP), Objective Assessment (OA), follow-up services, case notes and file maintenance. Case managers complete initial assessments of applicant skill levels, including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities, and support service needs prior to enrollment. Occupational assessments utilized include Career Scope, O\*Net Interest Profiler, and Career Research Worksheet to identify appropriate participant career pathways. Interviews with staff showed case managers are proficient in the requirements for eligibility and services, IEP formulation, monthly participant updates, supportive service policy, follow-up and job search services. As participants near the end of their training, case managers work with them on creating/updating their resume. If job search services are needed after training, the Business Service Team will distribute their resume to relevant business contacts and refer job posting from **KANSASWORKS.com**.

- CRC observed each WIOA participant case file contains detailed information on basic and occupational skills, work experience, career interests, supportive service needs, assessment results, eligibility documentation, case management notes and follow-up.

**Occupational Skills, Customized, and On-The-Job Training-** LWDA IV uses WIOA funding for classroom based occupational skills training (OST), On-the-Job training (OJT), or work-experiences/internships. Training services are provided to customers who are unlikely to obtain or retain employment that leads to economic self-sufficiency and have demonstrated the skills and qualifications necessary to successfully participate in the chosen training. WIOA funds will be used in coordination with all other funding sources the participant is eligible for. Local policy states training funding is limited to \$4,500.00 for training programs completed within two years. Aviation Manufacturing, Healthcare, and IT training programs have a higher funding limit. WIOA funds may only be used on classroom training programs from Board approved Eligible Training Providers (ETP) that leads to an industry recognized certificate/license/degree for an in-demand industry/occupation. During file reviews CRC observed:

- Customers that participated in occupational skills training completed the Workkeys test to demonstrate the skills necessary to complete training.
- Participants applied for funding other than WIOA by filling out the Free Application for Federal Student Aid (FAFSA) form.
- Participants attended training that matches their occupation on the IEP, and the occupations were listed as best fit or great fit on their O\*Net interest profiler.
- Participants only attended training from providers on the LWDB's list of Eligible Training Providers.

**Supportive Services Program Exit and Follow-Up Services-** 20 CFR 680.900<sup>7</sup> of WIOA directs LWDB to develop a policy on supportive services. LWDA IV policy states Workforce Alliance may provide support services to participants for transportation, child and dependent care, employment/training related expenses, and subsistence assistance. Participants must demonstrate the service is necessary to participate in employment or training activities and be in compliance with all aspects of the IEP. Each supportive service has a different funding limit, and each requires supporting documentation.

- During file reviews CRC observed six supportive services were administered to two participants. CRC read the local Adult Supportive Service policy and found the two files contained the required documentation for each of the supportive service received.

Participants are exited from the WIOA program after successful completion of training and no other services are scheduled or if no staff assisted services have been rendered for 90 consecutive days. The WA Customer Training Agreement has participants agree to provide pay stubs and/or employment information for one year after program exit. After exit, follow-up services are offered to participants for twelve months. Follow-up services may include career exploration, employment search assistance, or supportive services. Staff interviews and case notes show case managers are familiar with follow-up services and offer these services to participants before program exit. During interviews, staff mentioned most A/DW participants do not want follow-up services and CRC did not observe any follow-up services in the case notes during file reviews.

**Participant File Reviews-**CRC reviewed ten randomly selected files, five from the Adult program and five from the Dislocated Worker program. The files contained: eligibility documentation, signed supervisor eligibility approval form, a referral form, the notification of Equal Opportunity and Grievance Complaint forms, case notes, participant signed IEP, job placement and career assessment documentation, and labor market information. Participants that received training had Workkeys skill assessment, Eligible Training Provider verification, application for grant funding other than WIOA, customer training agreement, and supervisor signed budget obligation forms in their file. The documentation is well organized, and the case notes provide a detailed description of each interaction. CRC observed during file reviews:

- An Adult file has case notes that the participant had achieved a recognized certificate/degree, but no documentation of the certificate/degree is in the file.
- One Adult file in KW is missing case notes for the thirty-day contact/attempted contact note for multiple months before exit.

**Local Monitoring Procedures-**Title 2 CFR part 200.501 and 200.514 require *Nonfederal entities that expend more than \$750,000 in federal awards in a fiscal year must have a single or program specific audit conducted for that year. The audit must be conducted in accordance with GAGAS and cover the entire operations of the auditee.* The LWDB satisfied these requirements by hiring Regier, Carr & Monroe (RCM), LLP, CPA's to perform an annual monitoring audit of fiscal expenditures and program operations. CRC reviewed RCM's monitoring report from July – December 2020. Findings in the audit discovered LWDA IV does not have a policy/process to follow-up and track the training progress of participants who enter an apprenticeship program. WA replied to CRC this finding with *“the customer referenced was not enrolled in Apprenticeship training through WIOA or any of our other grant funds or programs. If the customer been a participant in Apprenticeship training through WIOA or another grant, then they are assigned a case manager who tracks their progress and checks in with them every 30 days.”* The LWDB

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<sup>7</sup> <https://www.ecfr.gov/current/title-20/chapter-V/part-680/subpart-G/section-680.900>

has an approved monitoring policy for Workforce Alliance staff to assure operations are compliant with federal regulations, state policies.

**Staff Interview-** CRC was able to interview a case manager from the Adult program, the Youth program and a Business Service Team member. The Adult program case manager was familiar with the requirements for customers to participate in occupational training, how to create an IEP with the customer and when the IEP needs to be updated. They work with participants to create a resume and upload it to **KANSASWORKS** with customers before training is complete. Case managers are familiar with how to determine if supportive services are necessary, to offer follow-up services after training is complete and to following-up with the participant once a month. The Youth case manager is familiar with: customer assessments and how to use those to create an ISS, what the fourteen youth elements are and who in the LWDA provides those services and how to help participants understand a career field's skill requirement and employment opportunities. They mentioned resume building and job search functions are performed in follow-up if needed. The Business Service Team uses social media to connect business partners with the Workforce Center, they are in constant contact with connected business for updated job information and upcoming events, they help adult participants with job placement after training and they keep track of their business outreach in **KANSASWORKS**.

**Program Success Story-** Jerry is a gentleman that came to the Workforce Center looking for assistance in gaining employment. He was unsure what he wanted to pursue, and his previous criminal record prevents him from working in person-centered occupations. This restriction and the nature of his charges made finding employment at a living wage difficult, and Jerry expressed that each job rejection was more disappointing than the last. Using tools facilitated by the Workforce Center such as My Next Move, he was able to identify CDL as an optimal career path. Jerry struggled with some aspects of his Next Steps, but with the assistance of his Workforce Professional and other Workforce Center staff, he was able to complete all his tasks with success within the eligibility period. Jerry utilized Workforce Center computers during Tech Time to complete the online parts of his training preparation, and without this free resource, competing his Next Steps would have been near impossible for him. Once complete, he decided on Kansas Truck Driving School, but this did not come without its own unique challenges. Because of his previous charges, Jerry had to attain extra documentation to attend, notably a pre-hire letter from a CDL employer stating that he will be able to secure a job upon graduation. Jerry attained this letter in record time and completed his CDL training at Kansas Truck Driving School on June 1, 2021. He secured employment within 8 weeks, and now works as an over-the-road truck driver starting at \$0.37 per mile. It was not difficult for Jerry to express his gratitude at the help he received from the Workforce Center, and his final email before exit simply states, "Thank you so much for everything".

### **Exit Conference**

CRC provided initial observations and best practices to Workforce Alliance Senior Administrators for response prior to publishing this summary report. CRC presented no findings, two areas of concerns, three observations and one recommendation. Based on Workforce Alliance's acceptable responses regarding noted areas of concern and observations, WA and CRC mutually agreed to forego an exit conference.



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## *APPENDIX*

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### **Success story continued:**

#### Workforce challenge:

CH came into the Workforce Center in June 2020, as he was seeking training as an LPN through WSU Tech. He had been laid off in the automotive industry in March 2020, working as an automotive painter. He wanted to switch interests completely and to work towards building a career in the Healthcare industry.

#### Workforce solution:

CH was approved for the Dislocated Worker program to assist with training cost associated with LPN core program cost as well as LPN completion costs. Client was able to get accepted to begin his core classes in Fall 2020 and completed all requirements by July 2021. While in the programs, client gained his CAN license (as a LPN prerequisite) on 6/25/2020 and his LPN license on 07/08/2021.

#### Outcome & Benefits:

After gaining his LPN license, CH had several interviews and prospects. He was able to gain employment on 7/16/2021 as a LPN. They started him at \$23.00, with full time hours and full benefits package. This will begin his journey towards a career in healthcare and give him the opportunity to continue a career pathway to addition credentials in the future. Chad was even interviewed by the local news station, KWCH, as part of a ‘Building You’ Career segment, detailing his success in switching careers and achieving training and employment goals.

### Alison R.

Alison was enrolled as a youth with physical disability, she is legally blind. She is able to see with the aid of magnifying lenses to read tags and computer screen. Alison was a college graduate but due to her disability and limited work history it was difficult for her to obtain employment. Alison completed Leadership Development training through online WorkKeys curriculum. She also used supportive services to purchase work clothes and bus passes. Alison was placed at Envision – BVI workforce innovation center to work as a marketing assistant. She participated in the program right before the CV19 shut down and so she was given the opportunity to complete 2 work experiences due to interruption of being a close contact to a person diagnosed w/ CV19. Alison completed her work experience in Jun 2021 and upon completion, she was offered a full-time position as a customer care specialist making \$12.50/hr.

### Esperansa A.

Esperansa was referred by the Cerebral Palsy Research Foundation (CPRF) Youth Transition Program. Esperansa was living with her grandparents and in 2020 earned her Associates in Liberal Arts Criminal Justice from Butler Community

College. She had little work experience and struggled to find employment. Esperansa carried many family responsibilities including caring for her younger siblings, grandparents, and helping her mother. She needed additional adult support to help with self-confidence, stress management, anxiety and making her goals a priority. Esperansa participated in career guidance, financial literacy and leadership development services. Esperansa experienced many job tours to find the best work experience opportunity. In June she was interviewed for a work experience with Envision Child Development Center. Esperansa was hired on directly with Envision on July 19th and did not need to participate in a work experience. She is working at Envision as an Early Childhood Educator making \$10.85/hr. Esperansa is building her confidence, learning new skills, and thriving in her current role with Envision.

### Imani O.

Imani came in as a single parent of a newborn little boy was unemployed and living with her parents. Her last job was working as a CNA in a nursing home but had to quit her job due to being very sick in her first trimester of pregnancy. Imani's goal was to complete healthcare training in order to be able to independently support herself and her son. Imani enrolled in training at Allied Health Career Training where she obtained Certified Medication Aide, Phlebotomy, EKG and Medical Assistant credentials. Imani worked part-time as a CMA and received clothing assistance for her scrubs while in training for her medical assistant certifications. She actively participated in counseling and mentoring services to support her with the stress of being a new mom, school, and maintaining employment. On September 21st, 2021, Imani started working full-time at Via Christi as a medical assistant, making \$14.27/hr. and full benefits. The increased pay allowed her to move out with her son to her own apartment. She is proud to be independent and able to support her son. Imani's future educational goal is to be accepted into an LPN program in order to become a nurse.