MONITORING SUMMARY REPORT

LWDA IV SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM PROGRAM YEAR (PY) 2022 REVIEW (SCSEP)

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MONITORING SUMMARY REPORT

LWDA IV SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM REVIEW

In November 2023, the Kansas Department of Commerce's (Commerce) Regulatory Compliance Unit (CRC) reviewed the Local Workforce Development Area IV (LWDA IV) Senior Community Service Employment Program (SCSEP) for compliance with Title V of the Older Americans Act (OAA), Federal Regulations at 20 CFR Part 641, and applicable United States Department of Labor (USDOL) Training and Employment Guidance Letters (TEGL) and Older Worker Bulletins (OWB). Workforce Alliance, Commerce's state grant sub-awardee, operates the SCSEP in LWDA IV which includes Butler, Cowley, Harper, Harvey, Kingman, Sedgwick, and Sumner Counties in south-central Kansas. Additional information about Workforce Alliance is available at www.workforce-ks.com.

Observations and Recommendations

Observation: New outreach partnerships with community organizations and host sites along with increasing workforce center traffic have increased program enrollments and expenditures. In PY 2022, the program gained 48 new participants compared to 30 new participants gained in PY 2021. At PY 2022 end, 65% of authorized positions (55 of 84) were occupied compared to 49% occupancy (41 of 84) at PY 2021 end. During the entrance conference, the SCSEP program manager noted that 64 of 84 program slots were filled for a 76% occupancy rate. In PY 2022, White persons had the highest participation rate at 64% followed by Black/African Americans at 25% and persons with disabilities accounted for 21% of all participants.

➢ **Recommendation:** SCSEP should continue to develop methods of participant outreach, recruitment, and selection that target eligible individuals including racial and ethnic minorities, persons with Limited English Proficiency, Veterans, individuals with disabilities, and persons with greatest economic need.

Best Practices and Program Highlights

➢ SCSEP provides fair and equitable consideration to applicants with disabilities, past criminal convictions, long employment gaps, and other barriers to employment.

➢ CRC observed the required equal opportunity notice on the Workforce Alliance website, Wichita Workforce Center lobby, in program outreach materials, and in participant files.

➢ In PY 2022, SCSEP met or exceeded all Core Performance Measures except for the Employment Rate – 4th Quarter after Exit.

BACKGROUND

Congress enacted the Workforce Innovation and Opportunity Act (WIOA) of 2014 to reform federal job training programs and strengthen the workforce investment system to put Americans, particularly those with employment barriers, back to work and make the United States more competitive in the 21st Century. Final WIOA rules were published in the Federal Register on August 19, 2016, to provide program implementation. The Senior Community Service Employment Program (SCSEP), authorized by the Older Americans Act, offers subsidized work-based training to unemployed and low-income older workers with poor employment prospects. Participants are employed in non-profit and public organizations known as "host agencies" where they work an average of 20 hours a week and receive the highest of the federal, state, or local minimum wage. SCSEP participants receive access to other American Job Center programs to obtain unsubsidized employment prior to reaching the forty-eight-month durational limit.

REVIEW SCOPE

Commerce, the designated WIOA grant recipient, monitors five local workforce development areas (LWDA) for compliance with the Act's federal rules and regulations addressing program service provision, adherence to uniform administrative requirements, and compliance with non-discrimination and equal opportunity provisions. Commerce's Regulatory Compliance Unit (CRC) completes this requirement through yearly program and fiscal 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 reference documents to prepare for onsite reviews which may include but are not limited to:

- ➢ Workforce Innovation and Opportunity Act (WIOA) of 2014, Final Rule
- ➢ 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- ➢ Previous monitoring reports issued by the U.S. Department of Labor Employment and Training Administration (USDOLETA), 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-recipient monthly fiscal and performance reports
- ➢ 2006 Older Americans Act Amendments, P.L. 109-365, 42 U.S.C. 3056 *et seq.*
- ➢ SCSEP Final Rule 20 CFR Part 641 and Training Employment Guidance Letters (TEGL) issued by USDOL
- ➢ 20 CFR Part 641 Interim Final Rule Senior Community Service Employment Program; Performance Accountability

Entrance Conference

CRC conducted the entrance conference on Wednesday, December 6th, 2023, at the Wichita Workforce Center. CRC staff members John Ybarra and Brenna Murfin conferred with Workforce Alliance SCSEP Program Manager Chip Reece. Workforce Alliance administrators provided CRC with program and financial documents prior to the onsite conference via Dropbox.

A.   Recruitment, Outreach, and Participant Case Management Services

Outreach and Recruitment (20 CFR Part 641.515)-Staff conducts outreach to senior service programs, host site agencies, and multi-cultural community organizations via in-person, telephone, and virtual platforms. The SCSEP manager continually recruits new host agency partners to expand participant work experience opportunities. CRC learned host agency and participant recruitment is most challenging in Cowley and Kingman counties. CRC observed program outreach flyers which included workforce center staff contact information. CRC reviewed outreach materials in Chinese, Vietnamese, Spanish and English languages. Additionally, Workforce Alliance convenes quarterly partner meetings to inform host agencies and senior service groups about various workforce center programs including the SCSEP.

SCSEP staff maintain an office at the Wichita Senior Services agency, a partnership that has become a primary referral source. Workforce Alliance also operates the Older Kansas Employment Program (OKEP) computer training program which has produced several applicant referrals. Another productive referral source is the workforce center Veteran service staff.

> ➤ **Recommendation:** SCSEP should continue to develop methods of participant outreach, recruitment, and selection that target eligible individuals including racial and ethnic minorities, persons with Limited English Proficiency, Veterans, individuals with disabilities, and persons with greatest economic need.

SCSEP Referral Protocol (20 CFR Part 641.535)-Applicants meet with career center staff to register in KANSASWORKS, create resumes, search jobs, perform assessments, and complete initial WIOA eligibility procedures. Career center staff then forwards applicant eligibility information to the SCSEP manager for approval. Once approved, a case manager sends the participant an application with documentation requirements and appointment date. Upon receipt, the case manager sends the completed application and documents to the program manager for review. Upon program manager approval the case manager places the participant into a community service assignment.

Local policy states applicants determined job-ready cannot be placed into a community service assignment and instead they are referred to the career center for employment assistance. Workforce Alliance notifies ineligible applicants verbally and through form letters stating reasons for exclusion. Applicants determined ineligible may appeal the decision and re-apply, seek career center services, or be referred to Wichita Senior Services.

Case Management Tracking System and Income Eligibility Certification (20 CFR Part 641.507)-SCSEP staff use the KANSASWORKS web-based system to manage participant caseloads, capture assessment details, establish Individual Employment Plans (IEP), search training providers, track job placements, and generate reports. Additionally, staff enter case tracking and detailed reporting data in the SCSEP Grantee Performance Management System (GPMS). GPMS is the central case management system for the United States Department of Labor (USDOL) modernization of systems across all programs.

CRC noted SCSEP staff calculate income utilizing both a 12-month and 6-month annualized method whichever is most favorable to the applicant and maintains income certification documents in participant files per 20 CFR Part 641.507. Case managers conduct eligibility re-certification once yearly after initial application. CRC observed through file reviews staff appropriately excluded income including unemployment benefits, Social Security Disability payments, and public assistance payments per 20 CFR Part 641.510.

Initial Assessments and Individual Employment Plan (IEP) Development (20 CFR Part 641.535)-During initial assessment, career center staff administers the *Prove It!* test to measure basic computer skills, professional etiquette, and employability. All applicants complete a self-assessment which collects information about their education, training, employment history, occupational interests, and barriers. Case managers utilize assessment results to develop Individual Employment Plans (IEP) to facilitate host agency assignments. CRC reviewed ten IEPs and noted the following documentation: need for SCSEP program, personal reasons for employment goal, current vs. needed skills, employment and educational history, skill development plan, training required, employment goals, client strengths, plan for overcoming barriers, customer and case manager responsibilities, economic need statement, supportive services needed, host agency placement, access to physical exam, case notes, client progress review, and follow-up needed. Case managers and participants jointly update IEPs every six months. CRC noted that case managers routinely inform participants failure to achieve agreed upon goals could result in program termination.

WIOA Coordination, Training and Supportive Services (20 CFR Part 641.210, 641.535-641.545)-CRC verified all SCSEP participants are co-enrolled in the WIOA Adult program to provide access to training and supportive services. SCSEP participants must attend resume writing courses, job search workshops, employment fairs, and computer trainings throughout their program duration. The Workforce Alliance Business Services Team works directly with area employers and refers SCSEP participants to job openings matching their qualifications. CRC learned very few SCSEP participants enroll in occupational training programs. Staff indicated most participants are interested in obtaining immediate employment and not furthering their education.

SCSEP participants also have access to the Older Kansas Employment Program (OKEP) that provides a new laptop to individuals who complete three workforce center computer workshops. OKEP increases participant computer skills and facilitates greater access to employment opportunities. Since the OKEP grant was initiated in March 2022, twenty-six laptops have been awarded to SCSEP participants.

CRC noted supportive services provided such as bus passes, gas reimbursement, utility assistance, rent/housing assistance, car repair, and employment-related expenses. Case managers identify supportive services need through assessment interviews and participant appointments. CRC reviewed ten case files and viewed supportive services were appropriately documented in the IEP and *Community Service Assignment Form*.

Program Exit and Follow-Up (20 CFR 641.570)-Participants are exited from the program upon obtaining un-subsidized employment, leaving the program voluntarily or involuntarily, or upon reaching durational limit. Each participant receives a termination letter thirty days prior to exit. CRC noted case managers document exit information on the *SCSEP Exit Form* (ETA 9123) and *SCSEP Statement of Exit Form*. CRC observed case note documentation showing case managers follow-up with program exiters for 12 months.

Host Agency Development, Policies and Procedures, and Host Agency Safety Inspections (20 CFR Part 641.535)-CRC noted Workforce Alliance's SCSEP has partnered with nearly 50 employers and recruited several new host agencies including the healthcare, community betterment, local government, and retail sectors. Workforce Alliance developed the *Host Agency and Participant Handbook* which outlines policies, procedures, responsibilities, and prohibitions for staff, host agency supervisors, and participants. Staff provides the handbook to participants at enrollment and to host agency supervisors during orientation. Participants must sign the *SCSEP Enrollment Agreement* requiring compliance with program regulations. Host agencies sign a *Host Agency Agreement* and *Host Agency Handbook Sign-Off* which notifies them about all SCSEP regulations and requires the following provisions: orientation, safety review, supervised training, job search assistance, assistance in upgrading employment responsibilities and personal development, and non-discrimination in the workplace.

Additionally, the *Host Agency Agreement* requires host sites receive an orientation to program regulations and participation in regular monitoring visits. Workforce Alliance created the *SCSEP Orientation Checklist and Host Agency Safety Monitor Forms* to monitor host agency safety requirements. CRC reviewed twenty-nine orientation and safety inspection monitoring reports completed and signed jointly by staff, host agencies, and participants.

SCSEP Participant Termination and Complaint and Grievance Policies (20 CFR Part 641.580, 641.900-910, and 20 CFR Part 683.600)-The *SCSEP Termination Policy* states participants may be terminated for the following: knowingly providing false information during the eligibility process, incorrectly determined eligible at enrollment or an annual recertification, determined no longer eligible at recertification, reaching the maximum 48 months participation limit, becoming employed during enrollment, and for cause. Participants receive the termination policy during the initial program appointment. If a participant fails to comply with their IEP, they receive a written warning and corrective action. Repeated failure to correct non-compliant behavior or situations involving serious harm or imminent threat to health, safety, or property, may result in program termination. SCSEP provides written notice to terminated participants with the grievance and complaint procedures and access to career center resources.

CRC learned a recently terminated participant submitted a formal grievance against the Workforce Alliance in November 2023. The participant was not showing up for work

consistently and when SCSEP staff addressed the issue he became indignant and stated his tardiness was for personal reasons. The SCSEP manager informed the participant about the Corrective Action and Warning procedures. The host agency requested to dismiss the participant who then visited the worksite twice in the same day resulting in his removal by police both times. Based on these actions, the SCSEP manager terminated the participant and provided the grievance and complaint procedures. The participant submitted a written complaint dated November 6, 2023, alleging he did not receive payment for hours worked. LWDA V Equal Opportunity Officer Chad Pettera investigated the complaint and found no evidence to support the non-payment claims. Mr. Pettera attempted to communicate with the complainant to address his concerns several times with no response; therefore, the complaint file has been closed.

CRC additionally learned that Workforce Alliance recently terminated Core Industries, Inc. as a host agency site for significant program policy violations. Workforce Alliance determined that the host agency supervisor employed participants to work at his side-business location on evenings and weekends. Additionally, the supervisor provided office keys to participants and placed them in charge of the host agency while he was on vacation.

Equal Opportunity and Non-Discrimination Provisions (29 CFR Part 38 and 20 CFR Part 641.827)-Workforce Alliance provides equal opportunity and complaint/grievance policy notices at enrollment and upon termination. Workforce Alliance processes SCSEP discrimination complaints per WIOA equal opportunity regulations at 29 CFR 38.69. Host agencies receive a non-discrimination notice on the *Host Agency Agreement* which the supervisor and SCSEP program director sign. Additionally, CRC observed the required equal opportunity notice on the Workforce Alliance website, in the Wichita Workforce Center lobby, and in program outreach materials and participant files.

Notice of Prohibitions (20 CFR Part 641.824 and 641.833-844)-Workforce Alliance developed a *Host Agency and Participant Handbook* which details policies, responsibilities, and prohibitions for staff and host agency supervisors, and participants. Workforce Alliance provides the handbook to participants at enrollment and to supervisors during host agency orientation.

SCSEP Prohibitions include:

➢ **Maintenance of Effort (MOE)**- Federal regulations at 20 CFR Part 641.844 prohibit recipients and host agencies from using SCSEP participants as substitutes for their regular employees. Host agencies who violate MOE run the risk of having their host agency status terminated by the Workforce Alliance.

➢ **Host Agency Layoffs**- Federal regulations at 20 CFR Part 641.844 prohibit SCSEP participants from training in the same area/department where the agency/organization has laid off a staff person within the last two years from the date of interest in SCSEP.

➢ **Prohibition of Termination**- Host agencies may not fire, terminate, dismiss, and/or let go of participants without the expressed consent of the Workforce Alliance.

- ➢ **Political Lobbying-** Host agencies must ensure that no SCSEP participants engage in partisan or non-partisan political activities during hours for which they are being paid with SCSEP funds.

- ➢ **Political Patronage-** A recipient or sub-recipient must not select, reject, promote, or terminate an individual based on political services provided by the individual or on the individual's political affiliations or beliefs.

- ➢ **Union Organizing-** Recipients must ensure that SCSEP funds are not used in any way to assist, promote, or deter union organizing.

- ➢ **Nepotism-** Recipients must ensure that no recipient or sub-recipient hires, and no host agency serves as a worksite for, a person who works in a SCSEP community service assignment if a member of that person's immediate family is engaged in a decision-making capacity (whether compensated or not) for that project, subproject, recipient, sub-recipient, or host agency.

B.   PROGRAM ADMINISTRATION AND FINANCIAL MANAGEMENT SYSTEM

Program Staffing and Local Workforce Development Board Representation-Workforce Alliance employs one full-time program manager and two full-time workforce professionals (case managers) to operate the program. Workforce Alliance provides an additional part-time staff member to assist with payroll processing; however, that employee is not paid from the SCSEP grant. Additionally, CRC reviewed an organizational chart and staff job descriptions. Workforce Alliance Administrators Keith Lawing and Chad Pettera represent the SCSEP on the Local Workforce Development Board.

Participant Payroll and Benefits (20 CFR Part 641.565)-Workforce Alliance contracts with Manpower Employment Services Inc. (Manpower) payroll management services. Participants submit weekly time sheets to their supervisors who sign and fax/e-mail time them every Friday to the SCSEP program manager. The program manager forwards verified timesheets via the M-Files document management system to fiscal staff for placement into spreadsheets. The payroll spreadsheets are then delivered to Manpower for payment processing. Participants may receive a paper paycheck or direct bank account deposit and can elect to receive a VISA-brand pay card to access funds at no charge. Manpower is the employer of record and provides workers compensation coverage, conducts employment eligibility verification, and withholds Federal, State, and local taxes, Federal Insurance Contributions Act (FICA), and Medicare taxes.

Workforce Alliance policy states SCSEP participants cannot collect unemployment benefits for hours worked and do not accrue sick leave or vacation time. If a participant is sick or unable to attend work, they arrange with the host agency to reschedule work hours for the current or following week. Participants may only receive holiday pay if their host agency is closed to observe a federal holiday on a day they are normally scheduled to work. All participants work at least 20 hours weekly and earn at least $7.25 per hour per Federal minimum wage.

CRC learned that the SCSEP has at times allowed participants to work more than twenty hours and receive up to $13.00 an hour to increase grant fund expenditures. SCSEP staff informed CRC that due to increased participant enrollments the SCSEP has returned to paying all participants $7.25 hourly.

Free Physical Examination (20 CFR Part 641.535)-At enrollment and annually, participants are offered a free physical exam paid for by SCSEP through the University of Kansas Adult Medicine Clinics. Participants accept or decline the physical exam via the *SCSEP Physical Exam Form* which is signed by participant and case manager. CRC observed signed physical exam forms, appointment scheduling letters, and purchase orders in participant files. CRC confirmed that SCSEP staff do not receive the physical exam results and the exam does not affect participant program status.

Financial Management System, Cost Allowability, and Audit Requirements (20 CFR Parts 641.821 and 847-870)-Workforce Alliance maintains a *Financial Management System* policy to govern local processes related to: budget controls, cash management, program income, cost allocations, allowable costs, pre-paid expenses, internal controls, and financial reporting. The Workforce Alliance is established as a 501(c) 3 Not-For-Profit Organization and follows 2 CFR Part 200 and 2 CFR 2900 for Uniform Administrative Requirements and cost principles. The Chief Financial Officer reviews and monitors each grant award for specific allowable activities or non-allowable activities to ensure compliance. CRC reviewed the Workforce Alliance OMB Circular A-133 Audit for the period ending June 30, 2022. There were no questioned costs or administrative findings related to the SCSEP.

CRC analyzed Workforce Alliance budget reports, listing SCSEP expenditures. Budgets accurately listed accumulated program/administrative expenditures and accounted for relevant cost categories and tracked monthly/cumulative balances, remaining percentages, and associated variances. Per the grant agreement, all payments made by Commerce to Workforce Alliance are on a cost reimbursement basis only for actual, reasonable, and necessary costs based upon the budget, per Commerce fiscal policies. Workforce Alliance must provide financial reports to Commerce summarizing expenditures no later than ten days after the last day of each month.

LWDA IV contracts with independent Paymaster Allen, Gibbs, and Houlik, L.C. (AGH) to ensure federal funds are drawn reasonably and necessarily; and disbursed timely. Commerce transfers funding to Workforce Allianc's financial institution within four working days of funding request. The Paymaster draws funds up to twice per week to issue Workforce Alliance authorized payments within five business days of a request for payment. CRC reviewed monthly fiscal reports depicting authorized and timely draw down requests submitted to Commerce for each funding stream.

The Paymaster has established a bank account at an allowable bank in Wichita solely for Workforce Alliance transactions. Three named AGH officers are authorized signers on the account. WIOA funds are released on a cost-reimbursement basis. AGH submits finding requests to Commerce which match the amounts included on signed authorizations for disbursement. Funds are wired directly from Commerce to Workforce Alliance's managed bank account. Once AGH determines requested funding has been deposited into Workforce Alliance's bank account,

AGH releases checks underlying the funding request for distribution. Checks are imprinted and issued on behalf of Workforce Alliance with "void after 90 days" language. The Paymaster conducts bank reconciliations within 15 days of month end and issues a monthly report listing outstanding checks more than 60 days old.

SCSEP Program Income and Non-Federal Share Matching Requirements (20 CFR Parts 641.806-809)-CRC noted in PY 2022, SCSEP produced zero program income and no funds were used for office equipment purchases. Federal regulations at 20 CFR Part 641.809 require all SCSEP grantees ensure at least 10% of the total cost of grant activities consists of allowable costs paid with non-federal funds. Workforce Alliance provides the non-federal match through in-kind contributions per 20 CFR Part 641.809(d). Host site supervisors track hours spent supervising participants then multiply the hours by their current wage value to calculate the weekly in-kind contribution on participant timesheets. CRC reviewed timesheets for ten participants and noted that some host agency supervisors did not submit supervising hours and wage values. The SCSEP program manager informed CRC some host agency supervisors are reluctant or simply refuse to provide their salary information to Workforce Alliance.

Additionally, the program received in-kind contributions via the Older Kansans Employment Program (OKEP). SCSEP participants that are co-enrolled in OKEP receive a free laptop computer. The SCSEP program manager informed the laptop computer cost is reportable as an in-kind contribution. The PY 2022 match amount was $95,827.31 which is 13% of the total cost of grant activities.

Program Expenditure Requirements (20 CFR Part 641.873)-Federal regulations at 20 CFR Part 641.873 require SCSEP grantees expend at least 75% of SCSEP grant funds to pay for participant wages and benefits. At PY 2022 closeout SCSEP had spent $635,756.15 of the $761,577.00 total grant funds obligated directly on participant wages and benefits resulting in an 83% expenditure rate.

C. PERFORMANCE MEASURES AND PARTICIPANT CHARACTERISTICS (20 CFR PARTS 641.700-750)

PY 2022 Final SCSEP Quarterly Progress Report and Participant Characteristics (ETA-9173)

- Number of Authorized Positions: 84
- Current Participants: 55 (65% of total positions occupied)
- Total Exits: 34 Year to Date
- Vacancies: 29 (35% of total positions vacant)
- Placements: 12 Year to Date
- Median Placement Starting Wage: $12.00
- Percentage of Placements with Benefits   25.0%
- Average Hours per Week in Placement   24.9

Gender	YTD Number	YTD Percentage
Male	32	36.36%
Female	56	63.64%
Race and Ethnicity	**YTD Number**	**YTD Percentage**
Hispanic/Latino/Spanish Origin	12	13.64%
American Indian/Alaska Native	1	1.14%
Asian	0	0%
Black or African American	22	25%
Native Hawaiian/Pacific Islander	0	0%
White	56	63.64%
Additional Participant Characteristics		
Receiving Public Assistance	56	63.64%
Family income at or below poverty level	42	47.73%
Individuals with disabilities	19	21.35%
Individuals with Limited English Proficiency	59	66.29%
Individuals with low employment prospects	83	94.3%
Homeless Individuals	24	26.97%
Veterans (or spouses)	11	12.36%
Individuals Formerly Incarcerated	4	4.49%

PY 2022 Performance Core Performance Measures (ETA-9173-SCSEP)

Core Measure	Description	PY 2022 Goal	PY YTD 2022 Actual	Result
Service Level	Participants who are active on the last day of the reporting period or who exited during the reporting period divided by the number of modified community service positions.	**125%**	**106.0%**	**Met**
Community Service	Community service hours in the reporting period divided by community service hours funded by the grant minus the number of paid training hours in the reporting period.	**70%**	**60.4%**	**Met**
Service to Most in Need	Average number of barriers. The total number of the following characteristics: severe disability, frail; age 75 or older, old enough for but not receiving SS Title II, severely limited employment prospects and living in an area of persistent unemployment, limited English proficiency, low literacy skills, disability, rural, veterans, low employment prospects, failed to find employment after using WIOA Title I, and homeless or at risk of homelessness divided by number of participants active on the last day of the reporting period or who exited during the reporting period	**3.07**	**3.61**	**Exceeded**
Employment Rate – 2nd Quarter after Exit	Of those not employed at the time of participation, the participants employed in the second quarter after exit quarter divided by participants who exit during the quarter.	**30.5%**	**25.0%**	**Met**

Employment Rate – 4th Quarter after Exit	Of those participants who are employed in the first quarter after exit quarter, the number employed in both the second and fourth quarters after the exit quarter divided by participants who exit during the quarter.	**26.6%**	**17.5%**	**Not Met**
Median Earnings	Of those participants employed in the first, second, and third quarters after the program exit quarter, total earnings in the second and third quarters after the exit quarter, divided by the number of exiters during the period.	**$3320**	**$4585**	**Exceeded**

Observations: SCSEP met or exceeded all Core Performance Measures except for the Employment Rate – 4th Quarter after Exit. At PY 2022 end, 55 of 88 authorized positions (65%) were occupied and female participation outnumbered male participation by 27%. In PY 2022, White persons had the highest participation rate at 64% followed by Black/African Americans at 25% and persons with disabilities accounted for 21% of all participants. In PY 2022, the SCSEP placed 12 participants into unsubsidized employment compared to 16 in PY 2021. In PY 2022, the program gained 48 new participants compared to 30 new participants gained in PY 2021.

PY 2022 4th Quarter Equitable Distribution Report

	Authorized Positions	**Participants**	**Occupancy %**
Butler County	8	5	63
Cowley County	7	2	29
Harper County	1	1	100
Harvey County	4	6	150
Kingman County	1	0	0
Sedgwick County	58	55	95
Sumner County	5	1	20

Observation: CRC learned from the SCSEP Program Manager that host agency and participant recruitment is most challenging in Cowley, Sumner, and Kingman counties.

D.   PARTICIPANT FILE REVIEWS AND PROGRAM MONITORING

(TEGL 12-06 and OWB 04-06)-CRC reviewed ten participant files which were well organized and thoroughly documented the following: IEPs, assessments, eligibility determination/verification, disability verification forms, complaint and grievance/equal opportunity notices, case notes, client status sheets, participant age, income sources, family size, proof of residence, host site/training assignment forms, weekly work schedules/timesheets, supportive service needs/provision and physical exam acceptance/refusal letters. CRC noted that IEPs are updated every four months and income recertification occurs annually.

The Workforce Alliance monitoring unit performs quarterly participant file reviews and forwards results and required corrective actions to the SCSEP program supervisor for response. CRC reviewed participant 12-month monitoring reviews and host agency safety inspections conducted by SCSEP staff. Additionally, CRC reviewed the SCSEP state-level (ETA 9179) quarterly performance report submitted to USDOL documenting progress toward meeting grant objectives.

E.   PARTICIPANT SUCCESS STORIES

Yurii and his wife entered the U.S. as refugees from Ukraine, escaping the war that has consumed their home country. With the help of the International Rescue Committee, they were able to settle in Wichita, where they began to make plans to work toward some independence. It was at this point that both he and his wife made contact with SCSEP, to see if they could get support finding employment in the U.S. for the first time. However, they had one stipulation: that they both be placed together so that Yurii could assist with translating for his wife, who does not speak English.

While being placed together limited the options available in SCSEP, Salvation Army stepped up to host the couple at one of their community locations, where they would assist with housekeeping and the food and commodities pantry. They were both very happy with this opportunity and made the best of it. The host agency reported that both of them did a great job and were willing to help in any capacity they could. While this experience was a nice start for them, Yurii had his sights set higher. He was determined to find a job in the aircraft industry in Wichita that would support both he and his wife, so that she could stop working and focus on her English.

Yurii's most recent background while he lived in Ukraine was in non-destructive testing for about 15 years and a degree in aircraft construction. While his education is not recognized in the U.S., he had the work experience and obtained his Gold WorkReady certificate, which is recognized by several aircraft manufacturing companies in Wichita. While Yurii took advantage of job fairs hosted at the Workforce Center, he struggled initially to get any interviews. SCSEP staff reached out the Workforce Center's Business Team to get other ideas, and was encouraged to have Yurii apply to Textron Aviation. After a successful interview, Yurii was hired at Textron starting 11/27/23 as a sheet metal assembler, where is now making $20.60/hr, full time. With this job, Yurii was able to achieve his goal of supporting his family and freeing up his wife to be able to pursue improving her English.

EXIT CONFERENCE

Prior to report publication, CRC provided SCSEP administrators with a summary of observations and recommendations. Noting a lack of compliance findings or areas of concern, Workforce Alliance and CRC agreed an exit conference was not necessary.