

Workforce Alliance of South Central Kansas, Inc.

Wichita, Kansas

Report on Agreed-Upon Procedures

July – December 2019



Workforce Alliance of South Central Kansas, Inc.

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Independent Accountant's Report
on Applying Agreed-Upon Procedures

To Management
Workforce Alliance of South Central Kansas, Inc.

We have performed the procedures enumerated in the attached supplement report, on the delivery of job seeker/participant services in accordance with the Comprehensive Monitoring Guide (CMG) Objective 1.E. for the period of July to December 31, 2019. Workforce Alliance of South Central Kansas, Inc.'s management is responsible for the delivery of job seeker/participant services in accordance with the Comprehensive Monitoring Guide (CMG) Objective 1.E.

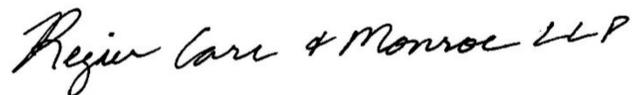
Workforce Alliance of South Central Kansas, Inc.'s management has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of determining their compliance with the Comprehensive Monitoring Guide (CMG) Objective 1.E. for the period of July to December 31, 2019. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

Our procedures and associated findings are described in the attached supplement report.

We were engaged by management of Workforce Alliance of South Central Kansas, Inc. to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the AICPA. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the delivery of job seeker/participant services in accordance with the Comprehensive Monitoring Guide (CMG) Objective 1.E. for the six-month period ended December 31, 2019. Accordingly, we do not express such an opinion or conclusion. If we had performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Workforce Alliance of South Central Kansas, Inc. and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of management of Workforce Alliance of South Central Kansas, Inc. and is not intended to be and should not be used by anyone other than these specified parties.



September 30, 2020
Wichita, Kansas

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

Indicator 1.e.1: Service Delivery

1. We read program literature to determine what services are available and relevant referral methods. Some of the more prominent information read in relation to the applicable programs included the following:
 - Training and Employment Guidance Letters (TEGL) 03-15 & 19-16
 - Career Center Services / Apprenticeship / WORKReady! Brochures & Flyers
 - Path to Employment Success Flyer
 - Levels of Service Protocol
 - Referral to Other Programs/Partner Referral Protocol
 - Tracking Partner Referrals Protocol
 - Partner Referral Guidelines

2. We inquired of program staff/case manager of how they ensure the full range of services is offered to clients.

No exceptions were noted during interviews. Staff discuss the "Path to Employment Success" with clients which includes a variety of services offered. Case managers appear to focus on the training opportunities with clients.

3. We performed a walkthrough of the customer flow to verify that the process promotes access to the full array of services available through the grant. We determined if walkthrough procedures are consistent with personnel responses and policies and procedures.

We discussed the customer flow with a staff member. Staff did not mention the other opportunities available if a client doesn't have a high school diploma or GED such as the occupational skills training that can be done in conjunction with training.

Indicator 1.e.2: Priority of Service

4. We read program literature to determine priority of service and how priority populations were established and obtained a listing of the priority service populations which were consistent with the policies and procedures. Some of the more prominent information read in relation to the applicable programs included the following:
 - Training and Employment Guidance Letters (TEGL) 19-16
 - Priority of Service for Veterans and Eligible Spouses Protocol
 - Priority of Service for Veterans and Eligible Spouses Policy
 - Priority of Service Policy
 - Priority of Service Supporting Documentation Protocol
 - Adult Program Priority of Service Verification Forms

5. We interviewed program staff/case manager to determine how priority service populations are served.

No exceptions were noted during interviews. Staff inquire whether clients are veterans or spouses of veterans upon check-in. The Adult Program has an additional checklist that is used to determine other priorities of service individuals may be eligible for.

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

6. We calculated the percentages of the populations served below based on reports generated by the client of all participants served during July through December 2019 under the Adult and Dislocated Worker programs. Some clients meet multiple priority of services, so each priority is compared to the total served individually and not in the aggregate.

Summary for the AUP report

Priority of Service	Adult		DW		Total Served	
	Served	% Served	Served	% Served	Served	% Served
Total Served	895	100%	208	100%	1103	100%
Eligible Veterans	120	13%	40	19%	160	15%
Individuals with a Disability	171	19%	16	8%	187	17%
Incumbent Workers	0	0%	0	0%	0	0%
Unemployed Individuals	680	76%	196	94%	876	79%
Employment Barriers:						
Displaced Homemakers	0	0%	0	0%	0	0%
Low-Income Individuals	541	60%	22	11%	563	51%
Older individuals	337	38%	67	32%	404	37%
Ex-offenders	143	16%	6	3%	149	14%
Homeless individuals or runaway youth	33	4%	2	1%	35	3%
Current or former foster care youth	0	0%	0	0%	0	0%
English language learners, individuals with low levels of literacy or facing substantial cultural barriers	71	8%	0	0%	71	6%
Eligible migrant and seasonal farmworkers	2	0%	0	0%	2	0%
Exhausting TANF within 2 years (Part A Title IV of the Social Security Act)	15	2%	4	2%	19	2%
Single parents (Including single pregnant women)	284	32%	31	15%	315	29%
Long-term unemployed (27 or more consecutive weeks)	257	29%	27	13%	284	26%

Indicator 1.e.3: Eligibility

7. We read the eligibility requirements, including the data collection requirements, outlined in the Funding Opportunity Announcement (FOA) and grant terms and conditions as well as the organization's policies and protocols related to eligibility.
8. We interviewed program staff/case manager to determine how each eligibility requirement is documented.

No exceptions were noted during interviews. Documentation is obtained by client attestation and from client provided documents. Documentation is maintained electronically unless there are conflicts of interest.

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

9. We selected a statistically relevant sample of the case management services and basic career services to view participant files and verify the following:
- a. Required documentation has been maintained in the participant file.
 - b. Eligibility determination is reasonable based on the information in the participant file.
 - c. Eligibility is verified prior to providing services.

The results from the sample of 40 case files are as follows:

- Twelve clients were enrolled in the adult/dislocated worker program and had the proper documentation in the participant file, eligibility was reasonable and was verified prior to providing services.
- Three clients required self-attestation with the services provided. Proper signed documents and notes were maintained of the services provided.
- Eleven clients did not require self-attestation with the services provided. Proper notes were maintained of the services provided.
- Four clients required self-attestation with the services provided but self-attestation was not done.
- Two clients did not have sufficient notes on the date of service to determine if self-attestation should have been completed.
- Four clients were receiving veteran services and services performed would require self-attestation under the basic career services but was not required since the client was receiving veteran services.
- One client was receiving re-employment services and services performed would require self-attestation under the basic career services but was not required since the client was receiving re-employment services.
- One client was not enrolled in the adult/dislocated worker program during the time frame of testing. Client was enrolled in KHPOP; services ended in July 2019.
- Two clients were co-enrolled in the TAA program along with adult/dislocated worker program. The clients were selective service compliant, but no documentation was maintained.

Indicator 1.e.4: Assessments

10. We interviewed program staff/case manager to determine how each assessment is performed and the impact the participant service plan.

We noted assessments may be as simple as a conversation with the client and documenting needs in the case notes or more complex assessments related to further training. We discussed the customer flow with a staff member. Staff did not mention the other opportunities available if a client doesn't have a high school diploma or GED such as the occupational skills training that can be done in conjunction with training.

11. We viewed a sample of case files and verified assessments gauge participant capacity/aptitude and identified participant skills/interests.

Of the 40 case files, 32 clients did not receive services which required an assessment to be done. Seven clients had the proper assessments and results to continue with their IEP. One client did not return after the IEP was completed; therefore, an assessment was not given.

12. We viewed a sample of case files to determine if the assessment process is effective in matching participants with appropriate service options to achieve desired outcomes.

Of the 40 case files, 32 clients did not receive services which required an assessment to be done. Seven clients had the proper assessment results to achieve the desired outcomes. One client did not return after the IEP was completed; therefore, an assessment was not given.

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

Indicator 1.e.5: Participant Service Plan

13. We read program literature and determined if a service plan was created for all participants, if the service plan was updated periodically for progress, and if written procedures addressed modifications.
14. We interviewed staff/case manager to determine whether participants were involved in developing their own service plan and to what extent is the service plan is used to guide services.

No exceptions were noted during interviews. Personnel seemed aware of the policies/protocol that IEP's are required when clients are pursuing training opportunities. Staff address any barriers with the clients as necessary. The IEP's should be updated at least every 6 months.

15. Interview sample of participants to determine if they participated in developing their service plan, if they are aware of their employment goals, and how the service plan can help them reach those goals.

As stated in #16 below, of the 40 sampled case files, 9 clients had an IEP completed. We attempted to contact the 9 clients by phone to ask them the questions above. Results are as follows:

- One client was pleased with the services and was involved in the process of the IEP.
 - One client was involved in the process. However, she wanted training and claimed it was never offered to her.
 - One client was involved with the IEP process and was pleased with the experience except for when the Organization switched employees responsible for her case. Contact each month stopped when the change occurred.
 - One client was not willing to speak with us.
 - Five of the clients could not be reached.
16. We selected a statistically relevant sample of the case management services and basic career services to view participant files and verify the following:
 - a. Participant service plans were included in the participant file
 - b. The participant service plan reflected the needs identified through the assessment process.
 - c. The assessment was discussed with the participant and was involved with developing the participant service plan.
 - d. The participant service plan included both short-term and long-term goals.
 - e. The goals align with the participant performance outcomes identified in the grant (i.e., employed, measurable skills gain, employment retention, credential attainment).
 - f. The case notes document that there is ongoing contact between the case manager and the participant, that the participant's progress is being tracked, and that the service plan is updated when any change in circumstances, goals, or planned activities and services occurs.
 - g. Any extended lapses in service are explained.

Of the 40 case files, 31 clients did not require an IEP. Seven clients satisfied all of the above criteria. Two clients did not have monthly contact / contact attempts documented in the notes; however, items a-e listed above were documented correctly.

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

Indicator 1.e.6: Supportive Services

17. We read program literature and determined supportive services are an allowable cost and how the Organization worked with partners to provide those services. Some of the more prominent information read in relation to the applicable services included the following:
- Adult Supportive Services Policy
 - Adult Needs Related Payments Policy
 - Dislocated Worker Supportive Services Policy
 - Dislocated Worker Needs Related Payments Policy
18. We selected a statistically relevant sample of the case management services to view participant files and verify the following:
- a. Participants who need supportive services were being offered services.
 - b. Supportive services that were provided were done in accordance with FOA guidance and the grant recipient's policies and procedures.
 - c. The case notes and participant files identify the barriers that may prevent the participant from participating in and successfully completing the service plan.
 - d. Evidence that supportive services were provided in accordance with both the plan and the grant recipient's policies and procedures.

Of the 40 case files, 36 clients did not need nor received supportive services. Four clients received supportive services and items a-d listed above were followed.

Indicator 1.e.7: Training Services

19. We read program literature governing training services and obtained an understanding of how the training services are determined, provided, and utilized to meet participant goals. Some of the more prominent information read in relation to the applicable services included the following:
- WIOA Work Based Training Policy
 - Adult and Dislocated Worker Training Policy
 - Adult and Dislocated Worker Transitional Jobs Policy
 - Training Protocol
20. We interviewed program staff/case manager to determine how training determinations are made.
- Staff was knowledgeable of the requirements before a client enters training. If a client does not complete training, books and/or tools should be returned and partial refund of tuition should be requested, if applicable. Staff did not appear to be know these procedures.
21. We selected a statistically relevant sample of the case management services to view participant files and verify the following:
- a. Participants are involved in training program selection.
 - b. Training is appropriate for the participant to meet employment goals.
 - c. Training is being completed timely and delays are explained.

Of the 40 case files, 36 clients did not receive training services. Of the 4 clients that received training services, items a-c listed above were followed.

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

Indicator 1.e.8: Placement

22. We read program literature to determine employment placement requirements and goals.
23. We interviewed program staff/case manager to determine employment placement strategy.

No exceptions were noted during interviews. Staff encourage clients to look at job availability prior to training. After training, staff assist with resume tailoring and job searches for clients to obtain desired placement.

Indicator 1.e.9: Follow-up Services

24. We read program literature to determine the extent of follow up procedures. Some of the more prominent information read in relation to the applicable services included the following:
 - WIOA Adult and Dislocated Worker Follow-up Protocol
 - Contact Protocol for Case Manage Customers
 - Closure of Services Protocol - Case Manager to Exit Specialist

25. We interviewed program staff/case manager to verify if the extent of follow up procedures is consistent with policies.

Staff interviewed knew that follow-up should occur once a month for a year after training completion or employment.

26. We selected a statistically relevant sample of the case management services to view participant files and verify the following:
 - Documentation of the follow-up procedures is consistent with policies.

Of the 40 case files, 35 clients didn't require follow up services. Three clients were provided follow up procedures consistent with the policies. Two clients did not receive follow up procedures after their completed training and employment.

Basic Career Services

27. We performed a walkthrough of procedures for basic career services.

We did a walkthrough of a client's file with a staff member. We discussed what the client came in for and how the staff member assisted the client. The services provided would require self-attestation to be done and the staff member did not have the client complete it. During the interview, the staff member recognized that self-attestation should have been done and was not. Staff appeared knowledgeable about when self-attestation should be completed.

Two staff members were selected for interviews on the basic career services. We discussed the services offered and at what point self-attestation would be required to be done. Both staff appeared knowledgeable and no exceptions were noted during the interviews.

**Supplemental to Report on Agreed Upon Procedures
Workforce Alliance of South Central Kansas, Inc.
Agreed Upon Procedures and Findings**

Internal Monitor

28. We viewed the internal monitor workpapers and reperformed certain procedures to ensure consistency with the internal monitoring reports.

We selected 3 clients from the latest monitoring reports to reperform the procedures of the internal monitor. Of the 3 clients selected, 2 clients were provided services which required self-attestation, but self-attestation was not completed before the services were provided. One client was not provided with services that required self-attestation. Findings were consistent with internal monitor's report.

Follow up

29. We followed up and viewed actions taken on the previous monitoring report.

The immediate past monitoring report for the adult program was dated November 9, 2018. We discussed the findings with management and noted their resolutions for the findings.

WIOA Adult Program Eligibility Finding 1:

Finding: Program Eligibility – Staff assisted beyond informational activities prior to the eligibility for these services having been completed.

Client Resolution: Management has conducted trainings and team meetings with staff to address these issues. The organization has a bubble chart of what services are available without self-attestation and what services require self-attestation. They also focused on when the client should be referred to the individualized career service.

Current Status: During testing for the period July through December 2019, we did not find any clients receiving services before eligibility was approved except those noted in Basic Career Service Finding 1 below.

WIOA Adult Program Eligibility Finding 2:

Finding: Eligibility Approval – Immediate eligibility approvals are not being done.

Client Resolution: The organization has a dedicated person who reviews the clients' eligibility within 24 hours. Supervisors serve as backup when the staff person is out of the office.

Current Status: During testing for the period July through December 2019, eligibility approvals were done within the next couple days of the interview and data collection process.

WIOA Adult Program Eligibility Finding 3:

Finding: Data Validation – A large number of inconsistencies between information that was recorded in KansasWorks demographics versus what was recorded in the case notes.

Client Resolution: Management has held trainings with staff to teach how these inconsistencies can lead to false reporting. Management has created templates for staff to utilize in their notes to create consistency.

Current Status: During testing for the period July through December 2019, there were no discrepancies found in the 40 case files.

**Supplemental to Report on Agreed Upon Procedures
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Agreed Upon Procedures and Findings**

Basic Career Center Services Finding 1:

Finding: Eligibility – Customers received Basic Career Services funded by WIOA that went beyond those that are just informational in nature without ever being submitted for WIOA Adult Program eligibility.

Client Resolution: Management has conducted trainings and team meetings with staff to address these issues. The organization has a bubble chart of the services that are available without self-attestation and those services that require self-attestation. The organization has focused training on eligibility and re-educating staff on the services available without self-attestation and when self-attestation would be required.

Current Status: During testing for the period July through December 2019, 4 clients were found that received Basic Career Services funded by WIOA that went beyond those that are just information in nature without ever being submitted for WIOA Adult Program eligibility. See #9 above.

Basic Career Center Services Finding 2:

Finding: Selective Service – Documentation was in the notes that clients were non-compliant with selective services and yet they were still provided with WIOA funded Basic Career Services for which they were ineligible.

Client Resolution: Management has conducted trainings with staff to discuss protocols on selective service. The organization has performed training on resources available to be in compliance with selective services prior to completing a client's eligibility.

Current Status: During testing for the period July through December 2019, 2 files did not have the selective service documentation, but they were selective service compliant. See #9 above.

EL DORADO	PO BOX 847	EL DORADO, KS 67042-0847	316-321-1150
McALESTER	101 S. 2ND. STE. B	McALESTER, OK 74501-5345	918-426-1234
TUCSON	4801 E. BROADWAY BLVD., STE. 501	TUCSON, AZ 85711-3648	520-624-8229
TULSA	4200 E. SKELLY DR., STE. 560	TULSA, OK 74135-3209	918-494-8700
WAGONER	611-D W. CHEROKEE ST.	WAGONER, OK 74467-4618	918-485-5531
WICHITA	300 W. DOUGLAS AVE., STE. 900	WICHITA, KS 67202-2914	316-264-2335

To Management
Workforce Alliance of South Central Kansas, Inc.
300 West Douglas, 8th floor
Wichita, Kansas 67202

In connection with our agreed-upon procedures performed and related findings for the period of July to December 2019, Regier Carr and Monroe, L.L.P. recommends the following:

1. Training in the following areas could be provided:
 - a. Case Notes - Some notes were vague in relation to what services were provided to the client, see Attachment A. We recommend descriptive case notes.
 - b. Client Assessments - We recommend that staff evaluate if the assessments are consistent with the client's desires.
 - c. Self-Attestation - Some instances were noted from when self-attestation should have been completed. We recommend training for Basic Career Service staff in relation to self-attestation requirements.
2. The WaitWhile list did not consistently match the services that were actually provided to the client in the case notes. We recommend consistency between applications to clarify services that are rendered to each client.
3. We noted in one client file that a prescreen was completed, and the client was provided an application for an employer. However, no services were opened in KansasWorks. We recommend that services be reviewed to ensure compliance with policies and protocols.
4. There are some clients that use the Basis Career Services on multiple occasions. A policy could be implemented to ensure a case manager is assigned after a certain number of visits to the organization.

Examples of notes that were documented well are listed in Attachment B.

We appreciate the opportunity to work with you. If you have any questions, please do not hesitate to call.

September 30, 2020
Wichita, Kansas

Attachment A

1. If the WP assisted with completing an online resume, then self-attestation should have been done which it wasn't. Client already had a resume though so if WP was just helping with job searching, the notes should say that.

Customer Name: [REDACTED]
Staff Name: [REDACTED]
Agency: [REDACTED]
Case Detail Page: Add Notes Page
Contact Type: In Person
Reference Date: 09/16/2019
Descriptor: WFI, IA
Date: 09/16/2019
Notes: 9/16/2019 Face to Face Contact [REDACTED] met with [REDACTED] to work on online resumes Orientation & KansasWorks/Career Intake Assessment & Resources/Services provided: • Referral was submitted in M-Files for: N/A • The following resources and services were discussed/provided for [REDACTED] Job Search Assistance- Provided Job Search Resources and or Tips for Successful Job Search WORK HISTORY: [REDACTED] is currently Unemployed [REDACTED] was most recently employed at [REDACTED] as a CNC Machinist from 05/2007 to 09/2019 earning \$19.55 per hour, working 40 hours per week. Employment ended due to Resignation Unemployment Benefits Status: Not a UI claimant PLAN OF ACTION: After updating the KW account, WP assisted [REDACTED] with job searching and completing an online resume. Follow up appointment scheduled for Click here to enter a date. [REDACTED] Workforce Professional

2. Case notes should be clear as to what type of help was given on the resume. If general rules about formatting, structure and content is provided then no self-attestation but if WP is giving detailed advice then self-attestation should be done.

Customer Name: [REDACTED]
Staff Name: [REDACTED]
Agency: [REDACTED]
Case Detail Page: Add Notes Page
Contact Type: In Person
Reference Date: 07/23/2019
Descriptor: wfi, job search
Date: 07/23/2019
Notes: 7/23/2019 Face to Face Contact [REDACTED] met with [REDACTED] to do a job search Orientation & KansasWorks/Career Intake Assessment & Resources/Services provided: • Referral was submitted in M-Files for: N/A • The following resources and services were discussed/provided for [REDACTED]: Initial Assessment- Created or Updated KansasWorks Job Seeker Account General Resume Assistance- Provided General Information and/or Tipsheets on Resume Do's and Don't/Tips for a Winning Resume WORK HISTORY: [REDACTED] is currently Unemployed [REDACTED] was most recently employed at [REDACTED] as a picker from 12/18 to 1/19 earning \$15.60 per hour, working 60 hours per week. Employment ended due to Lay Off (it was a seasonal job) Unemployment Benefits Status: Not a UI claimant PLAN OF ACTION: [REDACTED] signed up for a KW account while she was waiting to see a WP. I took a look at [REDACTED] resume which was not bad. I made a few recommendations that might it improve it. I showed her how to do job searches on KW. We also talked about the adult program She wanted some time to think about her options. She sat an appointment for next week, and I think she might stop by the job fair on the 25th. Follow up appointment scheduled for 7/30/2019 [REDACTED]

Attachment B

1. A good example of notes when self-attestation was done before customized services were performed is below.

Customer Name: [REDACTED]
Staff Name: [REDACTED]
Agency: [REDACTED]
Case Detail Page: Add Notes Page
Contact Type: In Person
Reference Date: 07/09/2019
Descriptor: Basic Career Services/Resume assistance
Date: 07/10/2019
Notes: 07/09/2019 [REDACTED] met with [REDACTED] for updating account and general resume assistance ORIENTATION & KANSASWORKS (KW)/CAREER INTAKE ASSESSMENT & RESOURCES/SERVICES PROVIDED: • The following resources and services were discussed/provided for the [REDACTED]; Initial Assessment- Created or Updated KansasWorks Job Seeker Account Job Search Assistance- Provided Job Search Resources and or Tips for Successful Job Search Completed Basic Career Services Eligibility and Submitted the CSS and EEO via M-Files. Grievance and Complaint Policy Reviewed and Offered to the customer. Customized Resume Assistance- Provided specific suggestions for the client on their resume including formatting and content WORK HISTORY: WP assisted [REDACTED] with Resume and job search. She is a homeless person looking to move away from pet grooming. She will return with resume worksheet and we will build resume and begin job search [REDACTED] Workforce Professional

2. A good example of case notes that illustrate the resources and services discussed with the client. The notes were clear that the client was there for his adult enrollment and gave specific work history notes as well as a plan of action.

Customer Name: [REDACTED]
Staff Name: [REDACTED]
Agency: [REDACTED]
Case Detail Page: Add Notes Page
Contact Type: In Person
Reference Date: 08/21/2019
Descriptor: resume assistance
Date: 08/22/2019
Notes: 8/22/2019 Face to Face Contact [REDACTED] met with [REDACTED] to complete his adult enrollment. Orientation & KansasWorks/Career Intake Assessment & Resources/Services provided: • Referral was submitted in M-Files for: N/A • The following resources and services were discussed/provided for [REDACTED] Initial Assessment- Created or Updated KansasWorks Job Seeker Account Completed Basic Career Services Eligibility and Submitted the CSS and EEO via M-Files. Grievance and Complaint Policy Reviewed and Offered to the customer. WORK HISTORY: [REDACTED] is currently Employed [REDACTED] works at Top Notch as a builder. He started in April 2019 and makes 10.00 an hour working 40 hours a week. PLAN OF ACTION: [REDACTED] need help building a resume, so after getting his self-attestation I helped him create a solid resume. [REDACTED]