

U.S. Department of Labor

**Employment and Training Administration
Sam Nunn Atlanta Federal Center
Room 6M12 - 61 Forsyth Street, S.W.
Atlanta, Georgia 30303**



November 15, 2019

Dr. Jeff McCord, Commissioner
Tennessee Department of Labor and Workforce Development
220 French Landing Drive, 4A
Nashville, Tennessee 37243

Dear Dr. McCord:

During the period of August 12, 2019 through September 6, 2019, the U.S. Department of Labor, Employment and Training Administration conducted a compliance review for the programs that follow:

PY17 WIOA Youth	AA-30737-17-55-A-12
PY18 WIOA Youth	AA-32210-18-55-A-12
PY19 WIOA Youth	AA-33223-19-55-A-12

Enclosed is the report for the site review. The review included site visits to three of Tennessee's nine local areas: Northern Middle, Northwest, and Southeast. The enclosed report outlines the review scope, and identifies compliance findings, required corrective actions, areas of concern, and positive practices.

Please respond to the fifteen findings identified in the report within 30 days from the date of the report. Your response should be submitted to the Jessica Otieno, Federal Project Officer (FPO), at Otieno.jessica@dol.gov and RO3-RA-ATL@dol.gov.

We hope our review and this report are helpful to you. Please express our appreciation to your staff for their cooperation and assistance during this review. If you have any questions, please contact Jessica Otieno at (404) 302-5379.

Sincerely,

Acting Regional Administrator

Enclosure

cc: Deniece Thomas, Deputy Commissioner
cc: Kenyatta Lovett, Assistant Commissioner

Monitoring Report: TDLWD

Grant #'s AA-30737-17-55-A-12, AA-32210-18-55-A-12, AA-33223-19-55-A-12

EXECUTIVE SUMMARY

The U.S. Department of Labor, Employment and Training Administration (ETA) recently conducted a review of your organization's Workforce Innovation and Opportunity Act (WIOA) Youth program, Grant #'s AA-30737-17-55-A-12, AA-32210-18-55-A-12, AA-33223-19-55-A-12. The purpose of the review was to determine the level of compliance with terms and conditions of the grant, Federal regulations, and performance goals.

The following is a list of fifteen findings with the required action identified during the review:

- ❖ Finding 1: Non-Compliant State Board Membership
- ❖ Finding 2: Required Statewide Activities Not Fulfilled
- ❖ Finding 3: SWDB Criteria for Selection of Youth Providers not provided to Local Workforce Development Areas (LWDA)
- ❖ Finding 4: LWDA Memorandum of Understandings (MOU) Missing Required Information
- ❖ Finding 5: Required Youth Planning and Program Information not Provided in Local Plans, MOUs, and Provider Contracts
- ❖ Finding 6: Not All 14 Youth Elements Made Available
- ❖ Finding 7: State has Not Defined Basic Skills Deficient
- ❖ Finding 8: Local Area Requires Additional Assistance Policy Inconsistent with State Policy
- ❖ Finding 9: Insufficient Monitoring for Youth Program Requirements
- ❖ Finding 10: Local Areas Not Addressing Individuals Deemed Ineligible
- ❖ Finding 11: Local Areas Determining Youth Participation Based on Age
- ❖ Finding 12: Work Experience Activities Do Not Include Occupational and Academic Components
- ❖ Finding 13: Lack of Alignment Between Needs Assessment, ISS, Career Pathways, and Services Provided
- ❖ Finding 14: Local Workforce Development Board (LWDB) Missing Parent and Youth Involvement in Program Design
- ❖ Finding 15: Lack of American Job Center (AJC) and Equal Opportunity (EO) Signage

Six areas of concern identified during the review are listed as follows:

- ❖ Concern 1: Underreporting of Program Services
- ❖ Concern 2: Front Line Staff Eligibility Cheat Sheets
- ❖ Concern 3: Coenrollment Data Entry Issues
- ❖ Concern 4: Low Engagement and Co-enrollment From Partners
- ❖ Concern 5: Youth Program Integration with Business Services
- ❖ Concern 6: Incentives vs. Supportive Services

There are no questioned costs as a result of this review.

Please note that the review did not cover any areas outside the defined scope. Although no material issues came to the reviewers' attention other than those contained in this report, there is no assurance that other issues may not exist.

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SCOPE OF REVIEW

Date of Review:

August 12, 2019 – September 6, 2019

Date of Entrance Conference:

August 12, 2019

Date of Exit Conference:

September 6, 2019

Site(s) Visited:

Tennessee Department of Labor and Workforce Development (TDLWD), Nashville, TN
Northwest Tennessee Workforce Board, Dyersburg, TN (NW LWDB)
Northern Middle Tennessee Workforce Board, Clarksville, TN and Murfreesboro, TN (NM LWDB)
Southeast Tennessee Workforce Board, Chattanooga, TN (SE LWDB)

ETA Reviewer(s):

Jessica Otieno, Federal Project Officer (FPO)

Attendees at Exit Conference:

Deniece Thomas, Deputy Commissioner, TDLWD
Kenyatta Lovett, Assistant Commissioner, TDLWD
James Roberson, Assistant Administrator, TDLWD
Ivan Greenfield, Assistant Administrator, TDLWD
Jaylene Young, Assistant Administrator Programs, TDLWD
Nakeisha Ricks, Program Director, TDLWD
Carla Garrett, Grant Program Manager, TDLWD
Chris Risher, Internal Audit Director, TDLWD
John Dunne, Audit Manager, TN State Audit
Justin Attkisson, Program Integrity Director, TDLWD
Melissa Keels, FPO, ETA
Jessica Otieno, FPO, ETA

Grants/Programs Reviewed:

WIOA Youth Program

Time Period for Data Covered in Review:

April 1, 2017 to June 30, 2022

The purposes of the review were to:

- ❖ Determine if the grants/programs are operating in compliance with all applicable Federal laws, regulations, policies, and other grants management requirements.

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- ❖ Evaluate whether the grant program is likely to meet its projections for enrollments, expenditures and performance outcomes;
- ❖ Assess whether the quality of the grant program and/or services is sufficient to meet performance goals; and
- ❖ Identify any technical assistance needs.

Tools used to Conduct Review:

ETA Core Monitoring Guide
ETA Core Monitoring Guide Youth Supplement

The following areas, of the Guide and Supplement, were covered in the review:

Core Activity 1 Service Design & Delivery

Objective 1.A: Planning and Program Design

(C/E) Indicator 1.a.1: Strategic Planning

(C/E) Indicator 1.a.2: Service Design

(C/E) Indicator 1.a.3: Coordination and Integration

Objective 1.B: Implementation

(C/E) Indicator 1.b.1: Designating Personnel, Staff, and Hiring

(C/E) Indicator 1.b.2: Participant Recruitment Activities

(C/E) Indicator 1.b.3: Partnerships

(C/E) Indicator 1.b.4: Required One-Stop Partner

(C) Indicator 1.b.5: Establishing Contracts and Subawards

Objective 1.C: Products and Deliverables

(C/E) Indicator 1.c.1: Sustainability Plan

(C) Indicator 1.c.2: Product Development

Objective 1.D: Business Services and Employer Engagement

(C/E) Indicator 1.d.1: Sector Strategies

(C/E) Indicator 1.d.2: Career Pathways Systems and Programs

(C/E) Indicator 1.d.3: Business Services

Objective 1.E: Participant Services

(C) Indicator 1.e.1: Service Delivery

(C) Indicator 1.e.2: Priority of Service

(C) Indicator 1.e.3: Eligibility/Enrollment

(C/E) Indicator 1.e.4: Assessment

(C/E) Indicator 1.e.5: Participant Service Plan

(C) Indicator 1.e.6: Supportive Services

(C/E) Indicator 1.e.7: Training Services

(C/E) Indicator 1.e.8: Placement

(C/E) Indicator 1.e.9: Follow-Up Services

Core Activity 2 Grant Operations

Objective 2.A: Project Management

(C/E) Indicator 2.a.1: Specific Award Conditions

(C) Indicator 2.a.2: Prior Approval of Project Modifications

Objective 2.B: Budget

(C) Indicator 2.b.1: Budget Controls

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- Objective 2.D: Procurement and Contract Administration
 - (C) Indicator 2.d.1: Procurement Standards
 - (C) Indicator 2.d.2: Competition
 - (C) Indicator 2.d.3: Methods of Procurement
- Objective 2.E: Performance Management
 - (C) Indicator 2.e.1: Performance Reporting
 - (C) Indicator 2.e.2: Progress Monitoring
- Objective 2.F: Subrecipient Management and Oversight
 - (C) Indicator 2.f.1: Subrecipient and Contractor Determination
 - (C) Indicator 2.f.2: Pre-Award Risk Analysis
 - (C) Indicator 2.f.3: Post Subaward Responsibilities
 - (C) Indicator 2.f.4: Subrecipient Monitoring
- Objective 2.G: Records Management
 - (C) Indicator 2.g.1: Record Retention
 - (C) Indicator 2.g.2: Accessibility
 - (C) Indicator 2.g.3: Protected Personally Identifiable Information
 - (C) Indicator 2.g.4: Custody and Transfer
- Objective 2.H: Personnel
 - (C) Indicator 2.h.1: Personnel Policy and Procedures
 - (C) Indicator 2.h.2: Staff Positions
 - (C) Indicator 2.h.3: Salaries
 - (C) Indicator 2.h.4: Organizational Chart
- Objective 2.I: Civil Rights, Complaints, Grievances & Incident Reporting
 - (C) Indicator 2.i.1: Policies and Procedures
 - (C/E) Indicator 2.i.2: Notices
 - (C) Indicator 2.i.3: Facilities
 - (C) Indicator 2.i.4: Grievance and Complaint System
 - (C) Indicator 2.i.5: Incident Reporting

Core Activity 3 Financial Monitoring

- Objective 3.A: Internal Controls
 - (C) Indicator 3.a.1: Effectiveness and Efficiency of Operations
 - (C) Indicator 3.a.2: Reliability of Reporting for Internal and External Use
 - (C) Indicator 3.a.3: Compliance with Applicable Laws and Regulations
 - (C) Indicator 3.a.4: Performance Reports
- Objective 3.B: Accounting System and Financial Reporting
 - (C) Indicator 3.b.1: Basis of Reporting
 - (C) Indicator 3.b.2: Financial Reporting
 - (C) Indicator 3.b.3: Subrecipient's Financial Reporting
 - (E) Indicator 3.b.4: Performance Reports
- Objective 3.H: Audits and Audit Resolution
 - (C) Indicator 3.h.1: Audit Process
 - (C) Indicator 3.h.2: Subrecipient's Audit
 - (C) Indicator 3.h.3: Report on Internal Controls

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BACKGROUND

WIOA became law July 22, 2014, to help job seekers access employment, education, training, and supportive services to succeed in the labor market and match employers with the skilled workers need to compete in the global economy.

TDLWD serves as the administrative entity and fiscal agent for WIOA Title I and Title III programs. Tennessee is broken up into 9 LWDA's and 3 Regions. Currently, there are 23 AJCs spread across the state providing comprehensive access. In addition to these centers, Tennessee has 62 affiliate sites and access points with six mobile units that travel the state and provide services to customers in a mobile capacity.

As of the quarter ending June 30, 2019, TDLWD reported 4,595 participants enrolled in its WIOA Title I Youth program, from July 1, 2018 through June 30, 2019. The performance levels and negotiated goals are as follows. Achieving 80% of a negotiated goal is considered "meeting" that goal; above 100% is "exceeding." Of the three youth program measures for which goals were established, Tennessee is on track for meeting all three, as detailed below. Similarly, data provided by TDLWD show that the three LWDA's visited during the review are on track for meeting all three measures as well.

Core Indicators of Youth Program Performance	PY 2018 Negotiated Goal	Actual Performance Outcomes
Statewide: June 30, 2019, Rolling Four Quarters		
Employment, Education, or Training Placement Rate (Q2)	79.0%	80.9%
Employment, Education, or Training Placement Rate (Q4)	75.0%	80.5%
Median Earnings	Baseline	\$3,520
Credential Rate	70.0%	70.9%
Measurable Skills Gains	Baseline	56.4%

Northwest Tennessee: PY18 Q3		
Employment, Education, or Training Placement Rate (Q2)	79.0%	93.2%
Employment, Education, or Training Placement Rate (Q4)	75.0%	88.5%
Credential Rate	70.0%	82.2%
Measurable Skills Gains	Baseline	83.6%

Northwest Tennessee: PY18 Q3		
Employment, Education, or Training Placement Rate (Q2)	79.0%	85.6%
Employment, Education, or Training Placement Rate (Q4)	75.0%	81.5%
Credential Rate	70.0%	76.7%

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Measurable Skills Gains	Baseline	45.5%
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Southeast Tennessee: PY18 Q3		
Employment, Education, or Training Placement Rate (Q2)	79.0%	85.5%
Employment, Education, or Training Placement Rate (Q4)	75.0%	76.6%
Credential Rate	70.0%	71.2%
Measurable Skills Gains	Baseline	30.7%

Additionally, as of quarter ending June 30, 2019, TDLWD is on track to meeting their local level 75% Out of School Youth (OSY) and 20% Work Experience (WEX) expenditure requirements, collectively as a state. These numbers vary at each local level where the requirement is more strictly applied.

Program Year Funding	75% OSY Expenditure Rate, Percentage of funds expended	20% WEX Rate, Percentage of funds expended
PY16	90.3%	22.1%
PY17	95.3%	29.5%
PY18	95.0%	28.2%

FINDINGS

Finding 1: Non-Compliant State Board Membership - State CMG Indicator: 1.a.1. Strategic Planning

The State Workforce Development Board (SWDB) is not in compliance with the membership requirements under WIOA. The board has two vacancies for business representatives and a vacancy for a labor representative. The board does not meet the required 51% business majority requirement or the 20% workforce representative requirement.

The WIOA section 101(b)(1) and Training and Employment Guidance Letter (TEGL) 27-14 Attachment II describe State Board membership requirements which includes the expectation that the majority of members appointed by the Governor be those representing business, and not less than 20 percent of members are representatives of the workforce.

Required Action: The State must ensure that vacant member seats are filled to bring the SWDB into compliance. In its response to this report, the State must submit SWDB meeting minutes reflecting the appointment of the required members and an updated membership list, including identification of the required categories that each member represents.

Finding 2: Required Statewide Activities Not Fulfilled – State CMG Indicator: 1.c. Products & Deliverables

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The State is not fulfilling all required youth related statewide activities. Specifically, the state is not disseminating the list of eligible providers of youth activities or providing additional assistance to local areas with high concentrations of eligible youth. The State reported to previously post the youth providers, however during the time of this review the list is still not available or posted publicly.

While the State has a mechanism for local areas to request additional funding, no evidence was provided to demonstrate that high concentrations of eligible youth are being assessed or provided additional assistance by the State.

20 Code of Federal Regulations (CFR) §682.200 outlines the required and allowable statewide employment and training activities. Such required activities include: §682.200(b)(6) “Disseminating by various means... A list of eligible providers of youth activities as described in WIOA sec. 123...” and §682.200(k) “Providing additional assistance to local areas that have a high concentration of eligible youth...”

The State underwent major changes during a recent re-designation of 13 LWDAs into 9 LWDAs in October 2018, which may have impacted the previous eligible youth providers list and posting thereof. However, a full year later, this requirement remains incomplete.

Required Action: The State must develop and implement strategies, policies, and/or procedures necessary to ensure compliance with all required youth-related statewide activities. The State must submit documentation that demonstrates that these required statewide activities have been established and implemented.

Furthermore, it is recommended that the State establish a mechanism for leadership and the SWDB to understand, track progress, and be fully aware of the fulfillment of required statewide activities along with SWDB responsibilities. This mechanism for ongoing assessment of progress or fulfillment of responsibilities will help ensure that all activities and projects funded with statewide reserve funds can be fully-informed, data-driven, and in alignment with WIOA requirements.

Finding 3: SWDB Criteria for Selection of Youth Providers not provided to LWDAs – State CMG Indicator: 1.b. Implementation

The State has not provided complete guidance to the LWDAs with regards to criteria to be used by LWDBs in awarding grants for youth workforce investment activities or with regards to the provider selection process. In the state plan, the State’s criteria to be used by the local boards in awarding contracts for the youth workforce investment activities provides some general requirements; however, this guidance is neither provided nor further explained in the State’s Career Service Provider Policy or Procurement Guidance. The policies do not provide youth specific information, including the SWDB criteria, and none of the guidance provides language related to termination of contracts.

Furthermore, upon reviewing three LWDAs, the quality of the scoresheets varied. Also, it was not clear in any of the LWDAs that the scoresheet sufficiently ensured the required WIOA program framework or services, or that it fully aligned with the SWDB criteria. The youth service provider contracts for two LWDAs provided minimal or no detail for the specific youth services or requirements. Also, the contracts were not clear on the responsibilities of the service provider, or were vague on how

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the services would be delivered. One local area provided more program service detail, however it included inaccuracies in the actual 14 element descriptions.

WIOA sec. 102(b)(2)(D)(i)(V), further reinforced by OMB's ICR 1205-0522 and TEGL 6-17, requires the state plan to include: "with respect to youth workforce investment activities authorized in section 129, information identifying the criteria to be used by local boards in awarding grants for youth workforce investment activities and describing how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) in awarding such grants..." Additional information and requirements for the selection and determination of youth providers can be found at WIOA sec. 107(d)(10)(B) and TEGL 21-16. 20 CFR 681.420 describes how the LWDB must design the youth program and 20 CFR 681.460 lists the required 14 program elements.

Of the three WIOA programs, the youth program underwent the greatest changes, in quantity and content, from the Workforce Investment Act predecessor. These changes, and the broad and varied services provided specifically for the youth program must be taken into account in regards to program design and service delivery for a successful, effective program that meets WIOA requirements and intent. While TDLWD policy requires LWDBs to procure service providers for all participant services, the program design is the responsibility of the LWDBs. The LWDBs must understand how to structure procurement strategies to support program design and ensure that their procurement actions are compliance with WIOA requirements and the SWDB criteria.

Required Action: The SWDB must reevaluate the youth program design and service delivery requirements, provider selection criteria, and related youth policies for the statewide workforce system. The state must edit existing policies or further develop and disseminate more specific criteria to be used by the local boards in the provider selection process. Procuring, awarding, and terminating contracts for the youth workforce development activities must be included to address different requirements of the program such as the fourteen elements, various potential providers, and the providers' accountability and performance.

Finding 4: LWDA MOUs Missing Required Information – NM LWDB, NW LWDB, SE LWDB CMG Indicator: 1.a.3. Service Design

The LWDB's MOUs for all required partners are missing required information regarding the description of services to be provided, methods for referring individuals, and methods to ensure the needs of workers, youth, and individuals with barriers to employment.

20 CFR sections 678.500(1),(3), and (4) identify the MOU requirements of service descriptions, methods for referring individuals, and methods to ensure that the needs of workers, youth, and individuals with barriers to employment are addressed. 20 CFR 678.400 identifies the following as required partners: WIOA Title I Adults, Dislocated Worker, Youth, Job Corps, YouthBuild, Native American Programs, and Migrant Seasonal Farmworker Programs; WIOA Title III Wagner Peyser Act; WIOA Title II Adult Education and Family Literacy Act; WIOA Title IV Vocational Rehabilitation Program; Senior Community Service Employment Program; Carl D. Perkins and Technical Education Act Career and Technical Education Programs; Trade Adjustment Assistance, Jobs for Veterans State Grants programs; Community Services Block Grant; Housing and Urban Development; State Unemployment Compensation laws; Second Chance Act; and Temporary Assistance for Needy

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Families. Lastly 20 CFR 678.420(c) indicates that each required partner must enter into an MOU with the LWDB relating to the operation of the one-stop delivery system.

While the MOUs may meet minimum requirements, the content, descriptions, tables, and required information is not provided for all partners. Specifically, although not exclusively, the following information is missing: WIOA Title I Youth, Carl D. Perkins and Technical Education Act, and Unemployment Compensation programs.

While the local plan is intended to identify and outline the vision, strategies, policies, procedures, and local activities planned for the local area, the MOU establishes the agreement of all required partners in support of the local plan in order to carry out and fulfill the local plan. Without complete and thorough information in the MOU, the LWDA cannot ensure that all required partners clearly understand their role, how all partners will collectively provide services together, or confirm that the partners will provide services as required by WIOA.

Additionally, the LWDA's youth program design may benefit from agreements with other optional partners. This may help the local area to provide all 14 element-related services. It could also help them to provide the full menu of services needed by participants in order to increase credential attainment or employment, retention, and earnings of the participants. Leveraging other partner programs and co-enrolling eligible participants provides LWDA's with an opportunity to ensure access to and provision of beneficial, comprehensive services to WIOA youth participants, and facilitates accurate and complete data entry for all services provided across the multiple providers.

In all three local areas, while the youth program may have referred individuals to some partner agencies for services, there were no formal agreements with such youth partners, no formal description of services, or confirmation of how the partners would coordinate and collaborate, including sharing of participant service data. Without a formal agreement and delivery structure among partners, the case managers are unable to fully document and record the variety of services, specifically partner services, participants are receiving as a result of being enrolled in the WIOA program. It is recommended to include such optional partners into the scope and content of formal LWDB MOUs.

Required Action: The State must work with the local areas to amend their MOUs to include a description of services to be provided, methods for referring individuals, and methods to ensure that the needs of workers, youth, and individuals with barriers to employment are addressed for all required partners. The State must also reevaluate and modify their MOU guidance if necessary to ensure all required information is included. In its response to this report, the State must provide a copy of the amended MOUs and, if applicable, updated State MOU guidance.

Finding 5: Required Youth Planning and Program Information not Provided in Local Plans, MOUs, and Provider Contracts – NM LWDB, NW LWDB, SE LWDB CMG Indicator: 1.a.3. Service Design

Our review shows that not all local plans provide the strategic vision for the youth program. Descriptions are not provided for the youth service delivery framework, nor how the 14 youth program elements will be made available within a framework. Rather, the local plans either indicate a network of subcontractors, or omit how the 14 elements would be made available all together. All three

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local plans also either provided a vague list of the potential elements and services, or did not provide any information regarding the services at all.

The MOUs do not provide any detail regarding the service delivery framework for the youth program, do not identify any additional partners for the youth program elements, nor how the partners would coordinate services to address the needs of the youth. Furthermore, the youth service provider contracts do not provide specifics on responsibilities, or details regarding the youth services or service delivery framework. In short, all three primary governance documents that should identify, relay, and confirm the service delivery framework, services, partners, and method for serving the youth are neither providing such critical information nor ensuring alignment across all parties involved.

20 CFR 679.560(a)(5) identifies that the local plan must include a description of the LWDB's strategic vision to support regional economic growth and economic self-sufficiency, to include goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment. 20 CFR 679.560(b)(8) further requires the local plan to include "a description and assessment of the type and availability of youth workforce investment activities in the local area..." 20 CFR 681.420(b) requires that the local plan describe the design framework for the youth program and how the 14 program elements are to be made available in this framework.

20 CFR 678.500 requires required one-stop partners to include a description of services provided through the one-stop delivery system in the MOU, including the manner in which the services will be coordinated and delivered through the system. It also requires methods to ensure that the needs of workers, youth, and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services, including access to technology and materials that are available through the one-stop delivery system.

2 CFR 200.319(c) states that non-Federal entities written procurement procedures must ensure that a clear and accurate description of the technical requirements for the material, product, or service to be procured must be included in all solicitations.

In conversations with local leadership and front-line staff, the reviewer learned that some staff did not fully understand some of the 14 youth program elements and could not articulate how they would be delivered if needed. Lack of clear definition by the LWDB about the service design and the service delivery plan for the 14 elements resulted in limited understanding of the youth elements by staff. Also, this made case managers unable to appropriately address the full set of needs for youth participants. Case managers interviewed had primary working knowledge and processes for elements such as Labor Market Information, Supportive Services, and Paid Work Experiences, but had little knowledge or resources for several of the elements and thus do not utilize or refer participants for those services.

Limited use of the full array of available services indicates that service delivery options have not been effectively planned for, and/or that staff are not familiar enough with the 14 elements to properly assign or prescribe them to participants. The intent of WIOA and its corresponding regulations is to provide a full menu of options for wrap-around services to youth participants in order to meet a greater set of needs of the youth population. The lack of diversity for referrals or assignments, and the limited assignments to several critical program elements signal LWDB program design limitations that result in under-utilization of contracted youth providers and the possibility of a reduced scope of services/assistance for participants.

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Without providing the strategic vision, service delivery framework, description of services, partners, and coordination, and clear roles and responsibilities through these three guiding documents for the youth program, it is difficult to ensure that case managers and contracted youth service providers are serving customers with the full array of services in mind, or achieving the vision of the local area and State.

Required Action: The State must work with the local areas to amend their local plans, MOUs, and provider contracts to include the required information and ensure they are in congruence with each other and with the State Plan. In its response to this report, the State must provide a copy of the amended section of the local plan, MOU, and youth service provider contracts. The State must also work with the LWDBs to ensure that all case managers and youth provider staff have a full understanding of each of the 14 youth program elements, and how each are made available, delivered and reported within the youth program service design framework. Evidence must be provided to confirm this has been done and demonstrate how it has been addressed.

Finding 6: Not All 14 Youth Elements Made Available – NM LWDB, NW LWDB CMG Indicator: 1.e.1. Service Delivery

The LWDBAs have not identified and/or are not making all 14 program elements available to the youth participants, and are not providing participants with information about the full menu of services being available. During the review, the elements most commonly noted as missing or unavailable included: leadership development opportunities, adult mentoring, financial literacy education, or entrepreneurial skills training.

20 CFR 681.460 requires that all 14 program element services must be made available to youth participants. 20 CFR 681.420 requires that LWDBs must ensure that WIOA youth service providers provide participants with information about the full array of applicable or appropriate services available through the LWDBs or other eligible providers, or one-stop partners.

Although WIOA does not require all participants to receive all services, it does require that all participants have access to and awareness of all services. When case managers do not have the services available, which may include services provided through a partner agency or organization, or do not make participants aware of the full array of services, the LWDBA has no way to ensure that the participants will receive all of the appropriate services. In practice, this is quite often a result of lack of guidance and a developed service delivery framework from the LWDBs, as observed through the local plan, MOU, and career service provider contracts. When the service delivery framework is not developed, the partners not formally arranged or identified, and details not communicated to the case managers, the case managers are often unaware of the expectations for who would provide the services, unaware of the partners who may provide the services, or unable to provide the services themselves. Thus they either do not discuss them or do not offer them regardless of the participants need for such services.

Required Action: The State must work with the LWDBAs to ensure they have developed their program design, clearly articulated the service delivery framework and services through the service provider contract, and that all front line staff serving youth participants are appropriately trained. In response to this report, the State must provide documentation to confirm the specific providers the LWDBs have

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identified to provide each of the 14 program element services. In addition, the State must provide evidence of guidance and training provided to front line staff and information about how all participants are informed about the full array of services available through the youth program.

Finding 7: State has Not Defined Basic Skills Deficient – State, NM LWDB, SE LWDB CMG Indicator: 1.e. Participant Services

The WIOA youth eligibility criteria for the Basic Skills Deficient eligibility criteria is not defined by the SWDB. Furthermore, the SWDB did not defer this to the LWDBs, and is not defined or fully defined by two of the LWDB's reviewed.

20 CFR 681.210 and 681.220 identifies that Basic Skills Deficient is one potential eligibility criteria for both OSY and In School Youth (ISY) participants. 20 CFR 681.290(a) indicates that a youth is basic skills deficient if he or she (1) has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (2) is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society. Furthermore, it stipulates that the State or LWDB must establish its policy for 20 CFR 681.290(a)(2).

If the SWDB does not elect to establish a statewide policy for 20 CFR 681.290(a)(2), the State must clearly defer this requirement to the LWDBs and ensure that the LWDBs establish a local policy that meet the requirements of 20 CFR 681.290. The lack of a clear policy, either at the State or local level, results case managers not being able to sufficiently or appropriately determine that a youth participant is eligible when qualifying under this criteria, or they cannot determine the appropriate assessment instruments or documentation to support such qualification.

Required Action: The State must either develop a statewide policy to further define Basic Skills Deficient, as per 20 CFR 681.290(b) or defer this responsibility to the LWDBs in the State Plan. The State must then either ensure the LWDB's policy is developed or that the LWDB policy is in alignment with the State policy, and provide proof of guidance and training provided to the case managers for this clarification.

Finding 8: Local Area Requires Additional Assistance Policy Inconsistent with State Policy – SE LWDB, NM LWDB

CMG Indicator: 1.e. Participant Services

The WIOA youth policy for "Requires Additional Assistance" eligibility criteria for two of the three local areas reviewed is not consistent or in alignment with the State policy. The SE LWDB expanded the State's definition to include additional qualifications, thus establishing a policy which allows eligibility for youth beyond who the State has determined eligible. The NM LWDB policy is not consistent with the State policy, having different qualifications all together.

20 CFR 681.300 and 20 CFR 681.310 require either the SWDB or LWDB to establish a policy for the "requires additional assistance to enter or complete an educational program, or to secure and hold employment" criterion if using this criteria. 20 CFR 681.210 and 20 CFR 681.220 include "an individual who requires additional assistance to complete an educational program or to secure or hold employment" as an eligibility criteria for ISY and OSY.

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Required Action: The State must work with the LWDBs to either revise the Requires Additional Assistance Policy of the SWDB, LWDBs, or both in order for the SWDB and LWDB policies to be in agreement. In response to this finding, the State must submit the final, revised and approved policies to confirm corrections and consistency.

Finding 9: Insufficient Monitoring for Youth Program Requirements – State, NW LWDB, NM LWDB, SE LWDB

CMG Indicator: 2.f. Subrecipient Management & Oversight

The State's grant oversight structure and processes for monitoring has changed since the last ETA monitoring review. The State does still have some key monitoring functions in place, such as an annual onsite fiscal review, performance scorecards, and quarterly desk reviews including file reviews. However, the review uncovered that, at least at this time of transition, there is very little in place for programmatic reviews to ensure local's compliance with federal statutes, regulations, and terms and conditions for the WIOA youth program, in regards to monitoring tools, plans, and processes. While the current processes cover some aspects of the program such as financial systems and processes, eligibility, and quality assurance, it does not provide a mechanism or process to review, identify, or address programmatic requirements such as the issues identified in this report.

Similarly, at the local level, the LWDBs reviewed had very few processes or systems in place for monitoring procured youth providers. Some level of fiscal oversight and case file reviews were followed at all three of the LWDBs visited, however the tools, processes, or systems to ensure youth providers' compliance with federal statutes, regulations and terms and conditions for the youth program were generally absent. Without monitoring to assess and record youth service provider compliance and performance outcomes, the local areas could not ensure that funds are being used appropriately, performance goals are being achieved, and participants are receiving the services they need as intended by the law. Furthermore, the LWDBs did not have a method to track and monitor the five percent eligibility exception for those qualifying under the "Requires Additional Assistance" criteria.

WIOA and the Uniform Guidance contains multiple references to and requirements for oversight and monitoring responsibilities. The WIOA regulations at 20 CFR 682.200(j), 20 CFR 683.220, and 20 CFR 683.410 clearly identify oversight and monitoring as a State responsibility. There is similar language related to LWDB monitoring at 20 CFR 679.370. This section indicates that the LWDB must conduct oversight of youth workforce investment activities. Oversight and monitoring is not limited to financial activities, but rather many programmatic requirements and activities lead to fiscal decisions. The multiple programmatic requirements for the WIOA youth program significantly impact the program design, service delivery, and outcomes for the program and the participants alike.

The overarching requirements for both the State and local board are covered in the Uniform Administrative Requirements at 2 CFR 200.328(a) and 2 CFR 200.331(d). These sections require that the non-federal entity monitor its activities under Federal awards to assure compliance with Federal requirements and to ensure performance expectations are being achieved and that the non-federal entity "monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward..." 2 CFR 200.318(b) also provides: "Non-Federal entities must maintain oversight to

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ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.”

In regards to the “Requires Additional Assistance” exception, 20 CFR 681.310(b) states: “In each local area, not more than five percent of the ISY newly enrolled in a given program year may be eligible based on the ‘requires additional assistance to complete an educational program or to secure or hold employment’ criterion.” If using this exception and criterion as a means to qualify ISY participants, the local areas and the state must have a way to track and monitor this, similar to the five percent low income exception, and the OSY and Work Experience expenditure requirements.

Required Action: The State must ensure that its monitoring efforts meet the requirements stated above. The State must also ensure that the LWDBs establish and implement a formal program monitoring for their youth service providers. In its response to this report, the State must describe the steps it will take to ensure it conducts monitoring that is fully compliant with the requirements above, to also include programmatic monitoring. The State must provide the monitoring tool, monitoring plan, and monitoring schedule for the State’s review of local areas, and the same for the LWDBs monitoring of the service providers. Moving forward, the State should ensure that the State and locals begin each Program Year (PY) with an annual monitoring plan that addresses all fiscal, programmatic, and administrative requirements.

Finding 10: Local Areas Not Addressing Individuals Deemed Ineligible – NM LWDB, NW LWDB

CMG Indicator: 1.e. Participant Services

The LWDBAs are not meeting the requirement to refer individuals deemed ineligible for the program for further assessment or appropriate basic skills and training programs. Through policy review and interviews with LWDBA staff and case managers, it was noted that this may occur sporadically depending on the case manager, but no evidence was found that the LWDBs had provided any guidance to the providers or that it had been formally established in procedural operations with applicants or participants.

If a youth applies for enrollment in a workforce investment activities and either does not meet the enrollment requirements for that program or cannot be served by that program, 20 CFR 681.420(e) and (f) requires the eligible training provider refers the youth for further assessment if necessary or to appropriate programs to meet the basic skills and training needs of the youth. This requirement falls under the youth program service design framework required by the LWDB as per 20 CFR 681.420.

Required Action: The State must work with the LWDBs to review and evaluate their program design and ensure the LWDB has established the framework for the providers to meet this requirement. This may also need to be reflected in the local plan, contractual agreements with youth service providers, policy, procedural guidance, or monitoring tools. In response to this finding, the State must submit the applicable approved documents to demonstrate this requirement has been incorporated into the LWDBs program design framework and local operations.

Finding 11: Local Areas Determining Youth Participation Based on Age – SE LWDB, NM LWDB, NW LWDB

CMG Indicator: 1.e.3. Eligibility/Enrollment

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The LWDA's reviewed demonstrated that they are making program enrollment decisions primarily and often solely based on age rather than the service needs of the participant. In some cases, the first and only question asked to a youth upon entering the AJC is their age, after which they are either sent to the youth or adult case manager depending on the answer provided.

WIOA not only encourages the LWDBs to consider the benefit of serving a youth in the youth program versus the adult program, but it also allows for the youth to be co-enrolled in both programs if appropriate and beneficial. For those who choose not to co-enroll, however, 20 CFR 681.440 states that a local program must determine the appropriate program for the participant based on their service needs and if the participant is career-ready based on an assessment of their occupational skills, prior work experience, and employability. Thus, the determination as to which program the youth is enrolled must be based on the service need of the individual.

When observed in the field, this finding can be the result of a variety of program design or service delivery issues: a lack of availability of the 14 youth program element services and thus no clear distinction between the adult and youth programs; case managers' lack of understanding that the full menu of services is available; a lack of effective individual service need assessment to determine the most appropriate program or mixture of co-enrolled program services; or the lack of clear operational procedures for case managers to guide or ensure the eligibility and assessment activities are meeting requirements of WIOA. While there are often some similarities to the services available in the two programs, there are some differences as well. For example, an individual enrolled in the ISY between the ages 18-21 could pursue occupational skills training requiring an Individual Training Account for which the ISY program does not allow, whereas the Adult program does. Thus, the most appropriate program must be determined by the individual needs, knowledge, skills, and interests as required in WIOA.

Required Action: The State must work with the LWDA's to determine the cause(s) of this finding and an effective solution to both meet the requirements and most appropriately serve the individual based on need. As noted in the preamble, ETA does not intend to require local WDBs to establish specific processes to ensure that individuals are served in the appropriate program, but LWDBs need a process in place to assist in determining the appropriate program for participants between the ages of 18 and 24. In response, the State must provide documentation to confirm actions taken by the State and LWDBs to address and resolve this finding.

Finding 12: Work Experience Activities Do Not Include Occupational and Academic Components – NM LWDB, NW LWDB, SE LWDB CMG Indicator: 1.e. Participant Services

Work experience services provided to youth program participants do not include the required academic and occupational education components. Two of the local areas presented a work experience training plan which attempts to potentially identify academic skills or knowledge which would be required for the work experience position; however, there was no evidence that this document was completed consistently nor include a training plan or education activities to be undertaken by the participant to address the academic needs.

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In some cases, the documentation for the specific occupational skills or occupational skill training required for the work experience position was also absent or incomplete. For both the academic and occupational components, the LWDBs had not clearly established a framework, understanding of, or documentation requirements for these work experience service requirements. Through case manager interviews, the reviewer learned that work experiences were often extended by case managers based on an opinion or request from the employer or due to no permanent employment position becoming available for the participant rather than based on the specific academic and occupational skill training need of the individual. The establishment and implementation of a structured, consistent training plan for each work experience, similar to those utilized with On-the Job Training opportunities, would clearly demonstrate and justify the decision for the most appropriate work experience for the participant's career pathway and ISS; the fulfillment of the academic and occupations skill training components; and the length of the work experience.

20 CFR 681.600 states that work experiences are a planned structured learning experience that takes place in a workplace for a limited period of time. Work experiences provide the youth participant with opportunities for career exploration and skill development. Work experiences must include academic and occupational education. 20 CFR 681.460 clarifies that the specific program services provided to the youth participants are based on each participant's objective assessment and individual service strategy, and 20 CFR 681.420 requires the ISS to identify the participant's career pathways.

Required Action: The State must work with the LWDBs to review, assess, and revise their program design framework to ensure they are meeting the full requirements of the work experience program element. At a minimum, this must include the establishment of occupational and academic education components within a work experience activity and the worksite agreement or training plan to document the same. It is recommended that this review and revision also clarify the requirement for the work experience activity should be based on the participant's needs, goals, and career pathway as identified in the ISS. Documentation must be provided to confirm required changes are sufficient, completed, and implemented, including guidance or training to front line staff.

Finding 13: Lack of Alignment Between Needs Assessment, ISS, Career Pathways, and Services Provided – NM LWDB, NW LWDB, SE LWDB **CMG Indicator: 1.e. Participant Services**

The LWDBAs visited did not have clear evidence of formally established career pathways, requirement for youth program services to be provided in alignment with interpretation of assessments and needs identified on the ISS to include career pathways. The LWDBAs have not provided guidance for front line staff to ensure services provided to participants meet these requirements. The local areas confirmed that career pathways had not been established or that no guidance had been provided. Interviews with case managers demonstrated that guidance or operational procedures were not in place to ensure services are in line with the needs and identified career pathway of the participant.

The lack of alignment between a participant's assessment results, ISS including career pathway and individual goals, and services provided makes it difficult for reviewers to understand why any given service was provided and/or paid for with WIOA funds. Being able to demonstrate the symmetry between the objective assessment, the ISS and the actual services provided to the participant is not only the primary expectation of good case management, but it also justifies the costs associated with the services as being necessary, reasonable and allocable to the grant.

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In accordance with 20 CFR 681.420, each youth participant must have an objective assessment for the purpose of identifying appropriate services and informing the ISS. It further requires that the ISS is to be based on the individual's needs, must identify a career pathway, and must include education and employment goals. The ISS then prescribes the achievement objectives and services for the participant. 20 CFR 681.460 clarifies that specific youth program services provided to a youth participant must be based on each participant's objective assessment and ISS. Furthermore, the Uniform Guidance cost principles require that costs be necessary, reasonable and allocable to the grant.

Required Action: The State must work with the LWDBs to review, assess, and revise their program design framework to ensure they are meeting the full requirements of the provision of services based on the objective assessment and ISS, to include how the services are related to the identified career pathway. Documentation must be provided to confirm required changes are sufficient, completed, and implemented, including guidance or training to front line staff.

Finding 14: LWDB Missing Parent and Youth Involvement in Program Design – NM LWDB, NW LWDB, SE LWDB

CMG Indicator: 1.a. Planning & Program Design

Through LWDB staff interviews, no evidence or confirmation could be provided to demonstrate that LWDBs have the involvement of appropriate parents and youth participants in the design and implementation of its youth programs. Also, LWDBs do not have a mechanism or structure in place to involve these individuals. During the review, the LWDBs were able to identify some members of the community such as other local entities serving youth as a source for input and feedback for the local youth program design; however, their role and level of involvement in the design and implementation could not be clearly documented or confirmed.

The LWDB is responsible for assessing the needs of the youth population in the local area, determining the vision and strategies for the youth program and developing the program design framework, among other responsibilities. 20 CFR 681.420, which outlines how LWDBs must design the youth program, requires LWDBs to ensure that parents, youth participants, and other members of the community with experience relating to youth programs are involved in both the design and implementation of its youth programs. This requirement is also discussed in 20 CFR 681.650, which adds that LWDBs must also make opportunities available to successful participants to volunteer to help participants as mentors, tutors, or in other activities.

As an option, some LWDBs establish a youth committee in order to bring together community resources, support, and information in designing and implementing their youth program. Two of the three local areas do have a youth committee, however one local area's youth committee is not currently active and the other does not involve youth or parents in the committee.

Required Action: The State must work with the LWDBs to enforce the requirement for parents, youth participants, and other members of the community with experience relating to youth programs to be involved in both the design and implementation of their youth programs. The LWDBs must provide documentation of the mechanism or process they establish to incorporate this requirement into their local program design and planning for the youth program and evidence that the required individuals have begun participating.

Finding 15: Lack of AJC and EO Signage – NM LWDB
CMG Indicator: 2.i. Civil Rights

The AJC Common Identifier is not located on the AJC signage for the Murfreesboro AJC location. Additionally, the same AJC location did not have the Equal Opportunity Notice adequately posted. One poster was found in the center, however it was in a location where very few, if any individuals would encounter.

20 CFR 678.900(c) requires that as of July 1, 2017 each one-stop delivery system must include the “American Job Center network” on all products, programs, activities, services, electronic resources, facilities, and related property and new materials used in the one-stop delivery system. 29 CFR 38.34 – 38.38 provide the Equal Opportunity signage requirements, which must at a minimum “be posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on the recipient’s Web site pages...”

Required Action: The State must work with the LWDA to enforce all signage requirements and provide evidence that such requirements have been fulfilled.

AREAS OF CONCERN

Concern 1: Underreporting of Program Services

CMG Indicator: 2.e. Performance Management

The WIOA youth program has several potential services to be provided to participants, some of which are likely provided by a different partner entity or agency, such as Adult Education, a local training provider, or even a non-profit agency. During interviews with front line staff, many staff were not only unaware of the 14 program elements or corresponding providers, they were also unaware of the several service codes in the case management system. In some cases, they indicated the service that they or a partner would provide, but either incorrectly indicated that there was no service code for such service or indicated that they would not enter a service code for such activity.

Similarly, most all case managers interviewed did not understand the difference between services provided during participation and certain services allowable and provided during follow-up. As a result, they were unaware of the difference in service codes for these two phases of the participant services.

In both instances, based on the interviews, it is very likely that there is a high occurrence of underreporting of services. These codes, referred to service codes or activity codes, in the case management system are translated as the State’s PIRL data and reported to ETA. When case managers are unable to accurately track the services provided to participants, the reliability of the state’s reporting is questionable. Without proper reporting, performance outcomes will be impacted; the State and local Areas do not get credit for the services that are being provided to participants; and, if there is an expense associated with the provision of that service, there could be financial impacts as well.

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Recommended Action: ETA recommends that the State develop an easy-to-use front line staff training or guide, and work with LWDBs to determine what actions must be taken at the local level to ensure full and complete participant reporting of services.

Concern 2: Front Line Staff Eligibility Cheat Sheets

CMG Indicator: 1.e. Participant Services

Despite the State's efforts to incorporate internal controls within the case management system for WIOA youth participant eligibility, much of the implementation and documentation is done by the case managers. For convenience, many case managers interviewed have created cheat sheets as their own quick reference guide to help them be prepared for the eligibility review and data entry for a participant. In most cases, the cheat sheets created were overly simplified, often excluding allowable eligibility criteria and thus reducing the potential pool of applicants who could qualify.

The cheat sheets were observed to serve a valuable need and purpose for the case managers in their initial intake process, but concerns were noted that some individuals could potentially be unnecessarily turned away due to the minimized eligibility cheat sheet.

Recommended Action: ETA recommends that the State and LWDBs evaluate this process and tool, and consider developing an easy-to-use laminated youth eligibility cheat sheet for case managers to ensure that they are aware of and equipped with the full eligibility criteria.

Concern 3: Co-enrollment Data Entry Issues

CMG Indicator: 2.e. Performance Management

During interviews with LWDB staff regarding co-enrollment of participants in the WIOA youth program and other programs, a potential issue with the case management system was identified. The local area demonstrated how attempts to co-enroll an individual into more than one program appeared restrictive in the case management system, and only one program was permitted to be selected in the system.

Recommended Action: ETA recommends that the State and LWDBs look into this potential system control and determine if the system is in fact limiting the data entry or if staff training could be the cause. Once the cause is identified, take actions to resolve the concern and share with all appropriate staff.

Concern 4: Low Engagement and Co-enrollment From Partners

CMG Indicator: 1.b. Implementation

The LWDBs reported additional challenges related to coenrollment with other community partners, especially non-core partners, though not exclusively. Despite discussions at LWDB meetings, the intent and plans for co-enrollment shared by the State to the LWDBs does not match that from other agencies. This could potentially reflect a need for discussions with the leadership for other state agency programs, an attempt to align and coordinate guidance across agencies, or even State technical assistance to LWDBs for partnership development and program integration.

Recommended Action: ETA recommends that the State and LWDBs further explore the challenges surrounding coenrollment across partner agency programs to uncover potential causes, then take necessary actions to further align, coordinate, integrate, and support coenrollment efforts across programs.

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Concern 5: Youth Program Integration with Business Services

CMG Indicator: 1.d. Business Services & Employer Engagement

In many local areas, as also evidenced during this review, procured youth service providers result in visiting employers independently to explore and secure connections and opportunities for the community's youth participants. In the recent years, TDLWD has made efforts to integrate business services functions to reduce duplication and increase effectiveness for local businesses. Since the youth providers are typically procured, these individuals and the youth program in general tend to naturally become excluded from the integrated business services teams' activities. This creates a separate, independent staff contacting the employer, thereby circumventing the previous efforts for coordination and streamlined services.

Recommended Action: ETA recommends that the State and LWDBs further explore the business services activities and needs for the youth program, and determine how these could also be incorporated into the integrated, streamlined business services team to support the State's integrated business services vision.

Concern 6: Incentives vs. Supportive Services

CMG Indicator: 1.e. Participant Services

20 CFR 681.640 clarifies that incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Supportive services, however, are services that enable an individual to participate in WIOA activities, per 20 CFR 681.570. During review of LWDB policies and case management staff, it was unclear to the reviewer whether the staff understood that incentive payments are not supportive services, and thus also should not be recorded in the case management system as a supportive service. In some cases, if a case manager were to record an incentive payment as a supportive service in the case management system, it would not only represent inaccurate reporting, but it could also make it appear as if the participant had received supportive services, one of the 14 youth program elements, when they had not. Incentive payments are not one of the 14 youth program elements.

Recommended Action: ETA recommends that the State and LWDBs review policy guidance and data entry processes to ensure that incentive payments for youth are not misclassified as supportive services and not recorded in the case management system as such. ETA recommends corrected system controls, guidance, or training for case management staff as appropriate.

Promising Practices

The practices described below are noted for the record to provide a fuller picture of grant activities. Their inclusion here constitutes neither a specific endorsement nor a recommendation for future funding

Practice 1: Automated Programmatic Internal Controls through the Case Management System

TDLWD has established some internal controls within the structure and processes of their case management system that can be seen to be very beneficial to both State and local operations. These controls provide additional assurance and support for the youth program requirements, and they have also eliminated some issues which have shown up in other states. For example, issues with meeting eligibility criteria is commonly seen in other states; however, TDLWD has established specific control

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elements within their case management system to lessen the occurrence of incorrect eligibility determination. TDLWD has also incorporated a statewide ISS into the system, which not only establishes a consistent statewide form for all case managers to use, but requires the ISS be completed during the appropriate and required point of eligibility and service delivery. Additionally, one issue other states have had is the determination of when an individual is deemed a participant in the WIOA youth program. This determination requires four specific components of the intake process to have been met. Since TDLWD has established these requirements in their case management system, the system and processes therein ensure that all requirements are met and captures the appropriate point in the process for the determination to be accurately made.

--END OF REPORT--