



2020-21 WIOA COORDINATED MONITORING REPORT

Governance, Program, Fiscal, and Civil Rights & Equal Opportunity

Southwest Wisconsin Workforce Development Board (SWWDB)

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Monitoring Dates:

17 May 2021 through 20 May 2021

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by the Department of Workforce Development/Division of Employment & Training (DWD-DET)

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Introduction

Section 184(a)(4) of the Workforce Innovation and Opportunity Act (WIOA) requires annual on-site monitoring of each local area within the state to ensure compliance with relevant federal regulations. DWD-DET takes a coordinated approach to monitoring that includes 24 objectives modeled after the United States Department of Labor Employment and Training Administration's (DOLETA) Core Monitoring Guide (August 2018), as well as a general review of program, fiscal, and data integrity.

The following terms utilized in this report were identified in the United States Department of Labor's (USDOL) "Ten Steps to Developing an Effective State Monitoring System":

Positive Practice: Used to highlight positive aspects of programs that may be shared with other WDBs to help improve their programs.

Area of Concern: Administrative or management practices that do not represent instances of non-compliance, but could become compliance problems in the future, if not addressed.

Finding: The identification of a specific Federal/State law, policy or procedure, or a local policy or procedure with which the WDB has failed to comply, that is serious enough to require corrective action.

Corrective Action: Step(s) that are necessary to address Findings or Areas of Concern. It is the Department of Workforce Development-Division of Employment and Training's (DWD-DET) expectation that the WDB will develop a corrective action plan, as appropriate.

Questioned Cost: A cost that is questioned by the auditor because of an audit finding: a) which resulted from a violation or possible violation of a statute, regulation, or the terms and conditions of a Federal award, including for funds used to match Federal funds; b) Where the costs, at the time of the audit, are not supported by adequate documentation; or c) Where the costs incurred appear unreasonable and do not reflect the actions a prudent person would take in the circumstances. (Note: an * in the Questioned Costs column in the Executive Summary indicates that there are still costs yet to be determined.)

Additionally, the following terms utilized in this report are defined by DWD-DET as follows:

Areas of Strength: An aspect of local area activities that is not necessarily innovative, but indicative of high quality WIOA execution, operationalization, and/or management.

Technical Assistance Needs: Compliance areas that the coordinated monitoring team has identified as new, and/or where additional training needs to be provided to the local workforce development board. If not corrected/addressed, non-compliance will be identified in during the following monitoring cycle.

Report Follow-Up

The WDB shall provide a response to this monitoring report that includes a corrective action plan addressing all required actions within 45 business days of the date this report is issued.

Upon receiving the monitoring response and plan, DWD-DET will issue a response either accepting the plan and closing the report or requesting any further action within 45 business days.

Consistent with [DWD-DET Policy 1.2](#) Areas of Concern and Findings that appear in two or more consecutive monitoring reports for the WDA may be elevated to include one or more of the following:

- Requirement of additional corrective actions
- Areas of Concern escalated to Findings
- Direct notification of specific issues provided to the Chief Elected Official for the WDA
- Implementation of more frequent monitoring of WDB activities by DWD-DET
- Mandatory DWD-DET provided technical assistance.

Executive Summary

OBJECTIVE	POSITIVE PRACTICES	AREAS OF STRENGTH	TECHNICAL ASSISTANCE NEEDS	AREAS OF CONCERN	FINDINGS	QUESTIONED COSTS
<i>Governance / Program</i>						
1-A. Planning & Program Design						
1-B. Implementation			1			
1-C. Products & Deliverables					1	
1-D. Business Services & Employer Engagement						
1-E. Participant Services				2	6	\$17,620.67
1-F. Contract Administration						
1-G. Performance Management					2	
1-H. Subrecipient Management & Oversight						
1-I. Records Management						
1-J. Program Integrity						
1-K. Data Integrity			1	.5+	2	\$1,250.00
<i>Fiscal</i>						
2-A. Budget						
2-B. Property Management						
2-C. Procurement and Contract Administration						
2-D. Subrecipient Management and Oversight						
2-E. Records Management						
2-F. Personnel						
2-G. Internal Controls						
2-H. Written Policies and Procedures						
2-I. Accounting System & Cash Management						
2-J. Financial Reporting						
2-K. Allowable Costs & Cost Classification						
2-L. Cost Allocation / Indirect Costs						
2-M. Audits & Audit Resolution						
<i>Civil Rights / Equal Opportunity</i>						
3-A. Civil Rights, Complaints, Grievances & Incident Reporting			1	1.5+	1	
TOTALS	0	0	3	4+	12	\$18,870.67

1Note + indicates a combined area of concern. The total number is accurate to the overall report

Detailed Report

I. Positive Practices

There are no Positive Practices identified in this report:

II. Areas of Strength

There are no Areas of Strength identified in this report.

1. Objective 1-A: Planning & Program Design

III. Technical Assistance Needs

There are three Technical Assistance Needs identified in this report:

1. Objective 1-B: Implementation – Participant Forms

Condition: The following issues were observed regarding certain intake forms, and the practices used in collection of individual intake data:

- Some files had uploaded drivers' licenses and Social Security cards, which were not marked "for administrative use only."
- Files have both photocopied drivers' licenses and Social Security cards and a completed Document Verification Form. The processes are duplicative.

Criteria: The following criteria apply:

- Eligibility to work in the United States is documented with one verification source from List A of the I-9 Form, or one verification source from List B of the I-9 Form and one verification source from List C of the I-9 Form (WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 12.3.1, 12.4.1, and 12.5.1).
- The WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 12.2.6 requires that documents that are used to verify eligibility that can be photocopied must be marked "for administrative use only."

Recommended Action: Review the forms and practices listed above and provide guidance to service providers on any updates to forms and practices.

2. Objective 1-K: Data Integrity – Data Sharing

Condition: One PIN had an email uploaded that contained a screen grab of the ASSET Services screen. This email was sent to the participant from the career planner.

Criteria: The data sharing agreement in effect at the time of this did not clearly specify "screen scraping of this nature, however, the Data Sharing Agreement between DWD and SWWDB, that was effective May 2021 states in Section V.A.2.d., "Screen-scraping or otherwise capturing DET Workforce Information for any purpose from on-line screens, including mainframe screens, is not permitted without prior approval of the DWD Data Steward." Future screen grabs of this nature could result in a finding.

Corrective Action: Review and correct the PIN-specific items identified in Attachment A. Train staff regarding Data Sharing agreements.

3. Objective 3-A: Civil Rights, Complaints, Grievances & Incident Reporting

Condition: WAVE evaluations conducted on SWWDB's websites identified ongoing accessibility issues for individuals with disabilities who use assistive technology to access website content. DWD-DET evaluation on 4.21.2020 revealed 0 critical errors but 16 contrast errors. As of 11.13.2020, SWWDB reduced the number of contrast errors to 8. As of the date of this report, those 8 contrast errors remain.

Criteria:

29 CFR 38.15(a)(5)(i)(ii) and (iii). WIOA-funded recipients and subrecipients must develop, procure, maintain, or use electronic and information technology, applications, or adaptations to ensure that the opportunities and benefits provided by the electronic and information technologies are provided to individuals with disabilities in an equally effective and equally integrated manner.

29 CFR 38.13(b) requires all WIOA Title I financially assisted programs and activities make their programs accessible.

Corrective Action: DWD-DET understands that SWWDB will re-design their website by 06.30.2021 to address the remaining website accessibility identified barriers. SWWDB must provide technical assistance to subrecipients to make their websites accessible in compliance with Section 508 or W3C's (WCAG) 2.00 AA.

IV. Areas of Concern

There are Four Areas of Concern identified in this report:

1. Objective 1-E: Participant Services – ASSET Data Entry

Condition: 19 of 21 PINs reviewed, or 90%, had at least one data entry error. Although the errors were varied, and no consistent trends were observed, several PINs were opened with planned close dates up to 2 years or more in the future, effectively serving as placeholders. This practice can cause participants to remain in active status incorrectly. Details can be found in Attachment A.

Criteria: ASSET is the designated management information system (MIS) and official system of record for customer reporting and data collection for the WIOA Title I Adult, Dislocated Worker, and Youth Programs, where all information required for federal reporting purposes must be completely and accurately documented (DWD-DET's WIOA Titles I-A and I-B Policy & Procedure Manual (DWD-DET WIOA Manual), Chapter 12.2.4). The accuracy and completeness of ASSET data entry is also critical for the purposes of resource planning, monitoring/evaluation, and state and local program management. TEGLs 7-18 and 23-19 provide the most current federal guidance on data validation and performance reporting requirements. Additional guidance on ASSET data entry requirements can be found in the ASSET Users' Guide, ASSET technical bulletin series, Chapter 11: Performance Accountability and Reporting of Wisconsin's WIOA Titles I-A and I-B Policy & Procedure Manual, and the WIOA PY 2018-2019 Title I Performance Technical Assistance Guide.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

2. Objective 1-E: Participant Services – Case Management

Condition: 8 of 21 files, or 38% of the file sample, had an identified weakness in overall case management. In three of the files, there was limited contact or large gaps in contact with the participant. In five of the files it appears that supportive services would have benefited the participant based on assessments or participant statements, but none were offered.

Criteria: 20 CFR 678.430 provides a description of basic WIOA Career Services, which include outreach, intake, and orientation to other services available through the one-stop delivery system, as well as the provision of referrals to partner programs. WIOA Sec. 2 states that one of the intents of the WIOA legislation is to "increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for the employment, education, training, and support services they need to succeed."

The June 2011 DOL Issue Brief titled Effective Case Management states, "Case management is an essential component of a customer centered workforce system." It additionally states that the following four components are essential to effective case management: "1. Direct customer service activities (assessment, career planning, coordination of supportive services, and job matching, placement, and follow-up); 2. Monitoring and documenting services and outcomes on a case-by-case basis; 3. Skilled case managers; and 4. Administration policies and practices and system infrastructures that support case managers and the case management function."

The WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 8.6 clarifies supportive services delivery and documentation for Adults and Dislocated Workers, while Ch. 10.5 covers supportive service provisions for Youth.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

3. Objective 1-K: Data Integrity – Case File Documentation and Objective 3-A: Civil Rights, Complaints, Grievances, & Incident Reporting

Condition: 12 of 21 PINs, or 57% of the file sample, were missing documentation of services listed in ASSET or were inconsistent with reporting in ASSET, were missing dates or signatures, or had errors on uploaded documentation. Three of nine PINS, or 33% of the EO file sample were missing the Babel Notice.

Criteria: The accuracy and completeness of file documentation is critical for the purposes of federal reporting, resource planning, monitoring/evaluation, and state and local program management. The DWD-DET Guide to WIOA Title I-B Eligibility Determination and Documentation, WIOA Title I-B Adult and Dislocated Worker Programs Guide to Participant Case File Documentation, and WIOA Title I-B Youth Program Guide to Participant Case File Documentation and DWD-DET WIOA Manual, Chapter 12: File Documentation (which became effective on September 1, 2020, and has superseded previous guidance on this topic) were in effect at the time of this monitoring.

Income, particularly low-income status, is a federal reporting requirement that impacts negotiated levels of performance via the statistical adjustment model, impacts priority of service determinations for Adult program participants, and may impact eligibility determinations for Youth program participants. The DWD-DET WIOA Manual, Income Guidance provides guidance on the types of income to count when calculating income for determining priority of service for the Adult program, eligibility for the Youth program, and economic self-sufficiency. The DWD-DET WIOA Manual, Low-Income Guidance provides guidance on what is required for a person to be considered low-income.

29 CFR § 38.9 (g)(3) Recipients must include a Babel notice, indicating in the appropriate languages that language assistance is available in all communications of vital information and on information posted on websites.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Recipients are required to take reasonable steps to ensure that LEP individuals have meaningful access to their programs and activities. SWWDB must include the Babel notice in communications of vital information and on information posted on their websites. Participant files must show evidence that the Babel Notice was shared when communicating and sharing vital information. Submit a training plan to DWD-DWT with the response to this report to ensure SWWDB's career planners and staff are aware of this requirement. Note: Failure to include the Babel notice in the participant files may result in a finding in future monitoring.

4. Objective 3-A: Civil Rights, Complaints, Grievances, & Incident Reporting

DWD-DET reviewed documents for EO/CR Compliance and noticed the following:

Condition 1: Documents containing an outdated EO/CR Assurance include:

The Work Experience (WEX) agreement uploaded in SharePoint has a correct EO assurance, and it has a revision date of 2/19. The WEX agreements in three out of nine files reviewed appear to be a newer version, 8/19. DWD-DET did not see the EO assurance because only two out of nine pages were included and uploaded in ASSET.

Criteria: DWD Policy 5.2 Assurance Requirements and 29 CFR § 38.25 require specific written assurance language in contracts, agreements, or applications.

Corrective Action: SWWDB must submit the most recent version of the WEX agreement showing the updated assurance language. Train Career Planners to ensure that all pages of documents are properly uploaded into ASSET (including Babel Notices and all other required assurances).

Condition 2: Seven out of nine PINs had Complaint Grievance Procedure Acknowledgements that include obsolete contact information for the EO Officer. Participants signed these acknowledgments between 07/01/2020 and 04/07/2021. The uploaded procedure in Share Point includes up-to-date EO Officer contact information.

Criteria: 29 CFR § 38.29 (c) - Recipients' obligations regarding Equal Opportunity Officers.

Corrective Action: SWWDB must submit a revised version of the document, showing the updated EO Officer contact information.

Condition 3: DWD-DET found documents with compliant EO/CR taglines, but some document's EO/CR taglines do not include language assistance verbiage for individuals with LEP needs.

1. Grievance Information Form
2. Complaint Grievance Procedure Acknowledgement revised
3. Work Experience Internship Agreement (2/19)
4. WIOA Application
5. Rights and Responsibilities Document
6. Disability Form

Criteria: 29 CFR part 38.38(a); 29 CFR part 38.39; and 29 CFR part 38.40 contain guidance on developing EO taglines.

Corrective Action: Incorporate the offer of language assistance into the EO tagline and accessibility statement. Submit revised versions of the outlined documents showing the updated EO tagline.

Questioned Costs: None

V. Findings

There are 12 Findings identified in this report:

1. Objective 1-C: Products & Deliverables – Timely Submissions

Condition: Desk Review Survey items were not all uploaded to the SharePoint monitoring folder in a timely fashion. The Desk Review Tool had missing responses that were re-requested and not completed by the required deadline. As of the Monday that monitoring began, the Program/Governance and Fiscal submissions were complete but the EO was not.

Criteria: WIOA Section 185(c)(1) states that each local Board receiving funds under WIOA "shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary." The 2020-21 monitoring cover letter, schedule, guides, and other materials were emailed to all local WDBs on 4/30/2020. The cover letter states that "All WDBs are required to complete the Desk Review Survey and upload the completed documents with any/all required attachments to the monitoring SharePoint at least 20 business days prior to their respective on-site monitoring date."

The WIOA Title I-A & Title I-B Policy & Procedure Manual, Ch. 1.4.11 states that any changes to the membership of the local WDB must be reported in writing to DWD-DET and provides seven items that must be included in that notification.

Corrective Action: SWWDB must provide timely responses to future DWD-DET requests for information.

Questioned Costs: None

2. Objective 1-E: Participant Services – Contact, Exit, and Follow-Up

Condition: 12 of 21 PINs, or 57%, had at least one issue with participant contact frequency, an exit date not based on the last date of actual service, and/or issues with contact frequency.

Criteria: The applicable standards are as follows:

1. **Contact:** SWWDB 2016-2020 Local Plan (Mod) states, "Contact shall be made monthly and documented in ASSET case notes. (Enclosure 4 – 5.3) Policy E-120-3 effective on 3/31/2020 states that Adult and Dislocated Work participants are to be contacted monthly and Youth bi-weekly.
2. **Exit:** 20 CFR § 677.150(c) provides the definition of "exit": the last date of service, determined when 90 days have elapsed since the participant last received services and when there are no plans to provide future services. It clarifies that services do not include self-service, information-only services, or follow-up services.
3. **Follow-Up:** DWD-DET's WIOA Manual, Section 10.5.3 (Descriptions of the 14 Youth Program Elements) states that all youth participants must be offered follow-up services for at least 12 months unless the youth declines them and that follow-up services must be reported in the "Manage Follow-ups" screen in ASSET. 20 CFR § 680.150(c) requires follow-up services to be made available for at least 12 months to participants to be placed in unsubsidized employment.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: None

3. Objective 1-E: Participant Services – Funding Supportive Services and Training

Condition: Five of 21 PINs, or 24%, lack documentation needed to support funding of training and/or supportive services.

Criteria: Documentation requirements for supportive services are described in DWD-DET's WIOA Manual, Section 10.4.1.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: Full amount is yet to be determined. Known questioned costs are \$4,416.00. See the PIN table for the specific costs questioned in each case.

4. Objective 1-E: Participant Services – IEP/ISS

Condition: Two of 21 PINs, or 10%, had an issue with the IEP or ISS, specifically they had IEPs that were not signed or attested to by the participant.

Criteria: 20 CFR 680.170 states that the Individual Employment Plan (IEP) for Adult and Dislocated Worker Programs is developed jointly by the participant and career planner, and is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve the employment goals.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: None

5. Objective 1-E: Participant Services – Priority of Service

Condition: Four of seven Adult Program PINs, or 57%, did not have documentation indicating that the participant was notified of their priority of service.

Criteria: WIOA Title I-A & Title I-B Policy & Procedure Manual, Ch. 8.3.2.1 states, " Priority of service must be assessed at the time of eligibility determination, and participants must be informed if they are to receive priority."

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: None

6. Objective 1-E: Participant Services – Program Eligibility

Condition: Seven of 21 PINs, or 33%, lack file documentation demonstrating that the participants were eligible for their programs. Two are specific to Dislocated Worker eligibility, one is specific to Youth eligibility, and four do not have all required general eligibility documentation.

Criteria: The DWD-DET WIOA Manual, Section 8.2.1, sets forth the requirements for Adult program eligibility.

The DWD-DET WIOA Manual, Section 8.2.2, sets forth the requirements for Dislocated Worker program eligibility.

The DWD-DET WIOA Manual, Section 10.3, sets forth the requirements for Youth program eligibility.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: Full amount is yet to be determined. Known questioned costs are \$8,814.60. See the PIN table for the specific costs questioned in each case.

7. Objective 1-E: Participant Services – Youth Work Experience

Condition: Four of the seven Youth PINs, or 57% of the Youth sample, had issues with Youth work experience, including a lack of documentation supporting an academic component to the Work Experiences. Other issues observed include a lack of monitoring of the Work Experience and the Work Experience not supporting the participant's career goal.

Criteria: 20 CFR §681.600 requires that every youth work experience must include both academic and occupational education components (WIOA Title I-A & Title I-B Policy & Procedure Manual, Ch. 10.5.3). The academic and occupational education must be designed to provide participants with contextual learning that may occur concurrently or sequentially with the work experience and may occur inside or outside the worksite. Both the academic and occupational education components of a work experience must relate to the same specific job or occupational area. The work experience must be tied to the goals identified in an ISS.

The WIOA Title I-A & I-B Policy & Procedure Manual, Ch. 12.6, provides additional guidance for ensuring that WIOA-funded work experiences are valuable and meaningful for the participant and the worksite while ensuring compliance with WIOA and related federal and state guidance.

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: Full amount is yet to be determined. Known questioned costs are \$6,868.67. See the PIN table for the specific costs questioned in each case.

8. Objective 1-G: Performance Management – Primary Indicators of Performance

Condition: Seven of 21 PINs, or 33%, had issues related to recording performance related information. This included participants who attained credentials that were not entered into ASSET, participants who had a Measurable Skill Gain (MSG) entered that may not have been earned, MSGs that were entered incorrectly, dates entered incorrectly for training, or supplemental data not collected/reported in ASSET.

Criteria: Sec. 116 of WIOA and 20 CFR § 677.155 require each core program to be assessed on the primary indicators of performance, including the Credential Attainment Rate and Measurable Skill Gain measures. 20 CFR § 677.205 indicates that each local area in a state is subject to the same primary indicators of performance for the core programs that apply to the State. States are subject to financial sanctions if they fail to meet adjusted levels of performance for the primary indicators of performance (20 CFR § 677.180). The WIOA Performance Technical Assistance Guide (pp. 57-92) provides instructions on how to properly enter a Credential or Measurable Skills Gain into ASSET. "At a minimum, WDBs must update participant information monthly to ensure monthly dashboards reflect accurate information (DWD-DET WIOA Manual, Section 11.14)."

Corrective Action: Review and correct the PIN-specific items in Attachment A.

Questioned Costs: None

9. Objective 1-G: Performance Management – Participation

Condition: Nine of 21 PINs, or 43%, appeared to have an incorrect participation date. Four were Youth, three were Dislocated Worker, and two were Adult PINs. Issues include assessments being given prior to the completion of eligibility determination and incorrect ASSET service dates that impacted the participation date.

Criteria: DWD-DET's WIOA Title I-A & I-B Policy & Procedure Manual, Chapter 10.4.1: Youth Enrollment Process Overview addresses the steps to Youth participation. TEGL 21-16 states that "the WIOA youth program design requires an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs" (pg. 7).

TEGL 10-16, Attachment 7 – Table A: Participant Level Services Chart WIOA Title I Adult, Title I Dislocated Worker, and Title III Employment Service Programs identifies both "Initial assessment of skill levels & supportive service needs" and "Comprehensive and specialized assessments" as participation-causing services.

Corrective Action: Review and correct the PIN-specific items identified in Attachment A.

Questioned Costs: Full amount is yet to be determined. Known questioned costs are \$2,704. See the PIN table for the specific costs questioned in each case.

10. Objective 1-K: Data Integrity – Case Notes

Condition: Three of 21 PINs, or 14%, had case notes entered more than ten days after the events they documented, one of which also had notes that were not sufficient to allow a reader to understand or evaluate service provision.

Criteria: The accuracy and completeness of file documentation and ASSET data entry is critical for the purposes of federal reporting, resource planning, monitoring/evaluation, and state and local program management. DWD-DET WIOA Manual, Section 12.2.5 states, "Effective case notes are objective, detailed, accurate, and timely. DWD-DET defines the timely entry of case notes as occurring within 10 calendar days from the date of the interaction being documented."

Corrective Action: Review and correct the PIN-specific items identified in Attachment A.

Questioned Costs: None

11. Objective 1-K: Data Integrity – ESS Calculations

Condition: Eight of fourteen PINs, or 57%, had ESS calculations that were either completed more than 30 days after eligibility determination or were not acknowledged by the participant.

Criteria: DWD-DET WIOA Manual, Section 8.4.3.4, effective 10/24/19, requires an ESS calculation to be run within 30 days of the close of the Eligibility Determination service.

Corrective Action: Review and correct the PIN-specific items identified in Attachment A.

Questioned Costs: \$3,040.00

12. Objective 3-A: Civil Rights, Complaints, Grievances, & Incident Reporting

Condition:

Issue1: DWD-DET found three case notes disclosing medical and disability information.

PIN # 1: 2434923; Note ID: 5745505 and 5769881

PIN # 2: 456961; Note ID: 5726184 and 5797730

PIN # 3: 2440400; Note ID: 5728319

Issue 2: The following documents contain medical and disability information, were uploaded in ASSET, and were not marked as confidential:

1. ASSET Printouts, (6/9).
2. Career Roadmap, (1/9).
3. Individual checklist. The form asks if the individual is hospitalized or institutionalized for medical reasons and whether he is handicapped physically or mentally (1/9).
4. Youth Barrier Verification for WIOA Service, (5/9).

Criteria: WIOA Title I-A & I-B Policy & Procedure Manual Chapter 12 File Documentation and 29 CFR § 38.41 - Collection and maintenance of equal opportunity data and other information requires that any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, be collected on separate forms. Whether in hard copy, electronic, or both, such information must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. These files, whether in hard copy or electronically maintained, must be locked or otherwise secured. DWD Policy 5.7 Collection and Maintenance of Medical and Disability-Related Information further details medical and disability information storage.

Corrective Action: Review all PINs of WIOA participants served on or after July 1, 2020 (DWD-DET will provide a WEBI report with a list of PINs to check). In ASSET, mark as confidential uploaded documents that contain disability and medical information. Develop or modify policies and procedures for staff to follow in collecting and maintaining disability and medical information.

Questioned Costs: N/A

Attachment A: PIN-Specific Checklist of Corrective Actions

This section contains an itemized checklist of Corrective Actions identified during file review separated by ASSET PIN for ease of use while making corrections.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
456961	AC3	No Babel Notice was seen in this file.		Provide the Babel Notice to the participant and add to the participant file.
585471	AC1	The Open date of the Initial Assessment service is incorrect. It should match the earliest date on any of the assessments, which is the 6/30/20 date on the Xyte.		Change the Actual Open Date of the Initial Assessment service to 6/30/20
585471	AC1	Several services appear to have incorrect dates: (1) The IEP Review service has an Actual Close Date of 9/22/20. It should be 9/23/30, which is the date the IEP was signed. The service is not complete until the IEP is signed by both parties. (2) Development of a Job Search Plan was opened from 7/10/20 – 2/10/21. Case notes indicate that this service was provided only on 2/10/21. (3) Career Planning open from 7/10/20 – 10/12/20. There is no indication in the case notes that this service was provided after 9/21/20. (4) The Occupational Classroom service must have an Actual Close Date matching the end of class unless an exam/test period is part of a regular semester. This does not appear to be the situation in this case.		(1) Change the Actual Close Date of the IEP Review service to 9/23/20. (2) Change the Actual Open Date of Development of a Job Search Plan to 2/10/21. (3) Change the Actual Close Date of Career Planning to 9/21/20. (4) Change the Actual Close Date for the Occupational Classroom service to 10/16/20, which is the end date of the training.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
585471	AC1	A Resume Development service was entered into ASSET, but provision of this service is not mentioned in the case notes and there is no copy of the resume uploaded.		If this service was provided, add a case note to describe it and upload one or more copies of the resume. If the service was not provided, change the Actual Open and Close Dates to Planned dates.
585471	AC2	The career planner did not try to contact the participant once/month, which means that opportunities to help her study for her exam and to help her find a job in her field were lost. Because the career planner and participant were not in contact, services should have been closed on 10/16 when training ended and participant should have exited in January '21.		Because a service was provided in February 2021, no action is needed.
585471	F2	Per case notes, no contact was attempted or made with participant between 9/23/20 and 2/4/21. The service provider contract requires contact at least once/month.		No action is needed.
585471	F11	The ESS calculation was not signed until 2/4/21. It needed to be done within 30 days of the close of the Eligibility Determination.		No action needed.
585471	TA1	Copies of the Social Security Card and driver's license must be marked, "for administrative use only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
585471	F3	The file does not support that the participant needed training in order to obtain self-sufficient employment. She already had an associate's degree in web analyst/programmer. Her dislocation wage was just under \$7000/month.	\$3,994.00	Provide evidence that the participant was in need of training to obtain a job providing self-sufficient wages. If this cannot be supported, provide a complete accounting of the funds spent on training this participant, transfer them to a non-WIOA source, and submit a copy of the GL with the response to this report.
585471	F4	The IEP created on 9/23/20 was not signed or acknowledged by the participant.		Exited file. No action required.
585471	F9	Three assessments were given before the Eligibility Determination was completed.		No action needed.
1267926	F11	ESS calculation not done at enrollment.		Exited file - no action required.
1267926	AC3	Application that is uploaded is not signed. It appears that it might not have been completely uploaded. Missing from the file is income collection for 6 months and annualized. Xyte Assessment is not completely uploaded		Upload the complete application and Xyte Assessment
1267926	F8	No follow-up conducted for the first full quarter after exit. Specifically, supplemental data needs to be recorded.		For the remaining quarters of follow-up collect all required performance data.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
1450081	F6	"Unlikely to return to previous industry" not documented in case file, other than case note dated 12/21/2020 which states that individual hasn't been able to find a high living wage job.	\$2,142.00	
1450081	F11	ESS calculation not attested in case file or acknowledged in CEPT.	\$1,790.00	Have the participant acknowledge the ESS calculation, either in CEPT, via email, or by signing a printout. This must be done before funding any training through WIOA.
1450081	TA1	DL and SS card not marked "For Administrative Use Only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
1450081	F9	Participation date should be 12/15/2020 based on date of SW WDB Initial Assessment. Initial assessment not entered into ASSET as an Initial Assessment service.		Enter Initial Assessment service for 12/15/2020, and correct participation date.
1775569	AC1	Open date of Objective Assessment service should be 1/18/2021 when participant completed BSD Screener		Correct the ASSET record.
1775569	AC1	3/3/2021 ISS seen in the file was not entered into ASSET as a service.		Correct the ASSET record.
1775569	AC1	Career Awareness, Exploration, and Counseling service is being held open.		Review the file and close the service on the last date of service provision.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
1775569	AC1	It is unclear from the file review that Education Offered Concurrently with Workforce Preparation Activities for a Specific Occupation service was provided. This service is also being held open.		Review program element definition to determine if service was provided. If it was provided, close service on the last date of service provision. If it was not provided, remove service.
1775569	AC1	Certificate in file dated 12/14/2020 indicates participant had some sort of Financial Literacy training, but case note indicates this workshop occurred on 3/3/2021. No Financial Literacy service entered into ASSET. Unclear whether this meets the program element definition.		Review program element definition to determine if service was provided. If it was provided, enter ASSET service.
1775569	AC1	ASSET Supportive Service open date should be 3/12/2021 and close date should be 4/2/2021 based on file documentation. Service is being held open.		Correct ASSET entry.
1775569	F2	Several services are being held open and should close because the record does not support that service is being provided.		Review the file, close services on last date of service provision, and evaluate PIN for exit.
1775569	TA1	SS card not marked "For Administrative Use Only."		Upload SS card marked "For Administrative Use Only" and delete existing document.
1775569	F7	Academic component of WEX not described in WEX Agreement or elsewhere.	\$3,014.00	Provide an accounting of work experience costs spent on this participant for DWD-DET review.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
1877431	AC1	<p>The IEP in the file dated 4/12/2021 does not have a corresponding service in ASSET.</p> <p>Career Planning was opened on 8/13/2020 with a planned close date of 8/13/2022. Services should be opened and closed to accurately reflect when services are provided.</p> <p>Job Search Assistance: Information about a specific vacancy: Case notes indicate that this was a general email sent to all clients. It does not fulfill the service provision of this service.</p>		<p>IEP: Update the ASSET record with the correct open date, and once a signature is secured for the IEP close the service for that date.</p> <p>Career Planning: Correct the ASSET record so that the service open and close dates indicate the date(s) this service was provided.</p> <p>Job Search Assistance: Correct the ASSET record by changing the dates to planned only or changing the completion code to "will never start this service."</p>
1877431	AC2	<p>The Roadmap and Initial Assessment each indicated participant needs (Housing, help paying for insurance, interview and work clothes, auto repairs, reliable transportation, energy assistance).</p> <p>The case file does not indicate that these needs were discussed with and/or offered to the participant.</p>		<p>If the participant is still in active status contact her to discuss supportive service needs.</p>
1877431	F2	<p>No attempted contact with this participant except for "all-client" emails between 9/14/2020 -12/16/2020 or 1/13/2021 – 3/29/2021. On 3/29/2021 the participant responded to an email that the career planner sent to all students.</p>		<p>No action required.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
1877431	AC3	<p>On the document verification form the career planner recorded the Social Security Number under Selective Service where the Selective Service Number is recorded.</p> <p>Only the first page of the Xyte assessment is uploaded, not the individualized page(s).</p>		<p>Exited file - no action required.</p>
1877431	F3	<p>Training Voucher dated 1/14/2021 on the signature line for the Authorized Individual it says "no signature needed due to COVID-19. Sent to SWTC." Although the document itself does not need to be signed in this instance, written verification, like an email, must be submitted.</p> <p>Both Support vouchers dated 1/14/2021 on the signature line for the Authorized Individual it says "no signature needed due to COVID-19. Sent to SWTC." Although the document itself does not need to be signed in this instance, written verification, like an email, must be submitted.</p> <p>There are no questioned costs because the fund source was changed to FSET.</p>		<p>No action required.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
1877431	F4	<p>The IEP dated 1/13/2021 says signed via email. This email was not seen in the documents uploaded.</p> <p>The IEP dated 4/12/2021 is unsigned. On the signature line it says that it was not done in person due to COVID</p>		Exited file. No action required.
1877431	F8	Supporting documentation for MSG entered for 12/15/2020 was not found in the documents uploaded. Case notes indicate that FSET has the school documents. A copy should be retained in the ASSET record as well.		Upload a copy of the MSG supporting documentation to ASSET.
1877431	F5	<p>No indication was seen in the case notes indicating that the participant was informed of her priority level.</p> <p>On the BSD Screener the Internal Use only box says "yes" that the individual receives priority, but the level of priority is not completed.</p> <p>On the BSD Screener the answer "yes" to receiving priority does not follow the form's instruction that it should be "yes" if the person answered "no" to any questions on the screener or if they could not complete it independently.</p>		Inform the participant of her priority level and case note the interaction.
1969196	AC1	Assessments were given, but no assessment service was entered into ASSET.		Participant has exited; no action is required.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
1969196	AC2	<p>The Client wanted a CDL, which is something WIOA can fund. It was decided that FSET should fund the training and this decision was not revisited even though the client felt that FSET would not move quickly enough and he would waste time waiting to start when he needed to earn money to live. Supportive services such as housing, utilities, car registration, etc. were not discussed although the client made the need for them clear. Supportive services possibly could have provided enough help to allow the client to complete a short CDL course. Ultimately instead of using FSET or WIOA resources, the client took another job while still planning to attend CDL school when he could better afford the time not working.</p>		<p>Based on the file, the client may return to the program. If he does, make sure to discuss appropriate supportive services to allow him to successfully attend training.</p>
1969196	F2	<p>The Quarter 1 follow-up survey was not completed.</p>		<p>Complete the Quarter 1 follow-up survey.</p>
1969196	F6	<p>The Dislocated Worker eligibility criterion, "unlikely to return to previous industry," is not clearly documented in the file. The case notes do say that "Client is unable to find a living wage job at this time based off his current set of skills..." but DWD policy requires self-attestation of this element. Self-attestation means a signed statement from the participant.</p>		<p>Participant has exited and no activities were charged to WIOA. No action is required.</p>
1969196	TA1	<p>Copies of the Social Security Card and driver's license must be marked, "for administrative use only."</p>		<p>Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2033421	AC1	WIOA Application states individual participates in free lunch program, but ASSET says no.		Correct ASSET entry.
2033421	AC2	Missing documentation and IEP, gaps in contact, and minimal case notes make this case difficult to review. Unclear whether more support or career planning could have benefitted this individual. She was a single mother of two on public assistance and ended up failing her training.		Participant has exited; no action is required.
2033421	F2	Participant should be exited to last date of service, which appears to be 3/24/2020. Career planning service held open.		Review PIN and exit to last date of service.
2033421	F2	Follow-up services and data entry are not correct since the file should be exited.		Once the correct exit date has processed, begin follow-up in accordance with local and federal requirements.
2033421	F2	Gaps in contact of longer than 30 days.		File should be exited - no action required.
2033421	F6	Social security number verified by printout from public assistance. Authorization to work, and therefore eligibility is not established for this individual.		Fix the Form

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2033421	AC3	Income on self-attestation form does not match income on WIOA application. Unclear which document is correct. WIOA application does not annualize income properly. Individual is low income regardless of form or calculation used.		No action required.
2033421	AC3	Case notes indicate participant took an XYTE assessment, but it isn't uploaded into ASSET.		Upload assessment into ASSET.
2033421	AC3	No IEPs uploaded into ASSET for this participant (IEP uploaded is for someone else).		Upload IEP into ASSET.
2033421	TA1	DL not marked "For Administrative Use Only."		Upload DL marked "For Administrative Use Only" and delete the current document.
2033421	TA1	Career planner verified citizenship with I-9 form, which was incorrectly filled out by using public assistance benefits. I-9 is not necessary for eligibility. The Southwest WI WDB Individual Checklist for WIOA Career Services verifies citizenship, which is not necessary for eligibility. It also allows for Social Security numbers to be verified by a printout from public assistance.		No action required.
2033421	F9	Initial Assessment service should open and close on 3/9/2020, and participation date should be 3/9/2020.		Correct ASSET entry and participation date.
2048639	AC1	The low-income determination appears to be incorrect. The participant made \$23,747 per year and was marked as At or below 100% FPL. However, 100% of PFL for a family of 3 in December 2020 was \$21,720.		Correct the ASSET record to indicate Neither of the Above. The family is still low-income because they receive public assistance.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2048639	AC1	It appears that Other Income Based Public Assistance is marked "yes" in ASSET because the participant receives Badgercare. Badgercare does not count as cash-based public assistance.		If Other Income Based Public Assistance was marked "yes" in ASSET because the participant receives Badgercare, change the ASSET field to "no." If it was marked "yes" because of receipt of some other form of public assistance, provide documentation of that.
2048639	AC1	The IEP review service opened on 3/10/21 does not have an Actual Close Date, even though the updated IEP was acknowledged on 3/10/21.		Correct the ASSET record to give the IEP Review service an Actual Close Date of 3/10/21.
2048639	AC1	The Career Planning service was opened with a Planned Close Date 2.5 years in the future. This service should be opened and closed whenever it is provided.		Close the existing Career Planning service on 12/23/20. Add additional Career Planning services on days when career planning services are provided.
2048639	F11	The ESS calculation was created in CEPT but was never acknowledged by the participant.		Have the participant acknowledge the ESS calculation, either in CEPT, via email, or by signing a printout. This must be done before funding any training through WIOA.
2048639	TA1	Copies of the Social Security Card and driver's license must be marked, "for administrative use only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
2048639	F5	No indication was seen in the case notes indicating that the participant was informed of her priority level.		Inform the participant of her priority level and case note the interaction.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2185900	AC1	Individual Income is marked as At or Below 100% FPL, when it appears that it should be Neither of the Above.		Correct Individual Income on the Youth Program tab in ASSET.
2185900	F2	The Career Awareness, Exploration and Counseling service was initially opened with an Actual Open Date of 4/30/20 and a Planned Close Date of 6/30/20. No service was provided on 4/30/20 and the Actual Open Date was changed to 5/4/20 and closed as of 5/29/20. On both those dates, the career planner had contact with the participant but still did not actually provide a service. Having this service open prevented ASSET from exiting the participant 90 days after the services provided on 2/12/20.		Submit a staff request change the actual dates for the Career Awareness, Exploration and Counseling service to planned dates and change the Completion Code to "Will Never Start this Service." ASSET will automatically change the Exit Date to 2/12/20.
2185900	F2	Local policy requires 4 quarters of follow-up, but no attempts to contact the participant are recorded for quarters 2 and 3 after exit. None of the follow up surveys have been completed.		Attempt follow-up contacts per local policy and complete quarterly follow-up surveys on the Follow-ups tab if possible.
2185900	AC3	File indicates that annualized Income should be \$1560, not \$1516. This error does not affect whether or not the individual/family is low income.		No action is needed.
2185900	AC3	The following documents were not seen uploaded into ASSET: the TABE and Xyte assessments and the ISS.		Upload the TABE, Xyte, and ISS for this participant to ASSET.
2185900	F9	WDA 11's 'Initial Assessment' was given on 1/22/20, before the participant had been determined eligible for the Youth Program.		Submit a staff request to change the Actual Open Date of the Initial Assessment service to 1/22/20.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2187526	AC1	Career Planning was opened on 2/24/2020 with a planned close date of 2/24/2021. This may have caused the participant file to be held open at a time when services were not being provided. The current close date is 9/14/2020, which is not supported by the ASSET record		Correct the ASSET record to show the dates that the Career Planning service was provided. It appears that the close date should be 2/24/2020.
2187526	AC2	This participant was enrolled into the Adult program while currently enrolled in a school not on the ETPL. Case notes indicate that the CP put most of the burden of getting the school on the ETPL on the participant. The participant provided the contact information for the CP to contact the school about getting on the CP, and the CP called, however the CP on 4/28/2020 after being asked if the school was on the ETPL "advised [the participant] to have them call the state to inquire about their application."		Participant has exited; no action is required.
2187526	F2	Contact: Per case notes, there is no attempted contact between 4/28/2020- 6/30/2020 or 9/14/2020 - 12/23/2020 Exit: The current exit date of 9/14/2020 is not supported by the ASSET record. It appears the correct date should be the last date of class in Spring 2020.		Update the ASSET record to close Career Planning close date to 2/24/2020, which appears to be the last date that service. Confirm that 6/20/2020 is the correct end date for the Occupational Classroom service. Update the ASSET record as needed so that the exit date is correct.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2187526	AC3	It does not appear that the entire Xyte assessment is in the file, only the cover page.		Exited file - no action required.
2187526	TA1	DL and SS card not marked "For Administrative Use Only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
2187526	F8	MSG entered that is not seen in the documents uploaded. MSG not allowable in this circumstance since it is Other funded.		Submit a staff request to have the MSG removed.
2187526	F8	Supplemental data required, but not collected or entered into ASSET.		Collect supplemental data, upload any documentation into ASSET, and enter wages for each quarter.
2187526	F5	No indication was seen in the case notes indicating that the participant was informed of her priority level.		Exited file - no action required.
2194139	AC1	The IEP service close date should match the date that the IEP was signed. In this case that would be 7/20/2020, the date of the email acknowledgment from the participant.		Participant has exited; no action is required.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2194139	AC2	<p>The participant notified the Career Planner on 8/18/2020 that she would be unable to start school prior to Spring 2021. CP discussed potential services with the participant that could be provided in the interim and that the CP would be taking leave. Other than the email sent on 8/19/2020 about that leave, there is no indication of attempted contact during that absence until the contact on 11/12/2020 informing the participant that she will be exited from the program.</p>		<p>Participant has exited; no action is required.</p>
2194139	F2	<p>Contact: No contact between 9/19/2020 and 11/12/2020. In this instance the Career Planner was on a leave of absence and it does not appear that the Career Planner assigned as a replacement during that leave contacted the participant. The 11/12/2020 email informed the participant that she is being exited. No contact attempted after that date</p> <p>Exit: Exit Date is not supported by the ASSET record. Currently it is 8/18/2020 but based on case notes, the last date a service was provided in 7/28/2020.</p> <p>Follow-Up: Supplemental data has not been collected as required.</p>		<p>Submit a staff request to correct the Exit date</p> <p>For the remaining quarters of follow-up collect all required performance data.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2194139	F6	Documentation required to prove eligibility to work in the USA was not seen in the documents uploaded. That row on the Document Verification Form is blank and no other documentation seen.		Upload required documentation that shows that this participant is eligible to work in the United States
2194139	F11	ESS calculation is created in CEPT but not acknowledged. Signature line on Calculation 2 (7/24/2020) says it was reviewed via Zoom. There is no written acknowledgement that this was approved by the participant.		
2194139	AC3	Programs screen is printed and in file. For Participant signature is states that it was discussed via Zoom. An email (or other written) verification is required in lieu of a signature. It does not appear that the entire Xyte assessment is in the file, only the cover page.		Exited file - no action required.
2286181	F2	Unable to validate employment after exit per data validation requirements so it's unclear if follow-up services need to be made available to the participant.		Obtain acceptable documentation of this data element, and update ASSET as appropriate.
2286181	F11	ESS calculation not done at enrollment.		Exited file - no action required. Individual was not entered into training.
2286181	AC3	There is no file documentation with individual and family income.		Exited file - no action required.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2286181	AC3	No documentation found in the ASSET record to substantiate 7/24/2020 Comprehensive Individualized or Specialized Assessment service.		Exited file - no action required.
2286181	TA1	DL and SS card not marked "For Administrative Use Only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
2286181	TA1	Career planner photocopied DL and SS card and filled out a Doc Verification Form. The processes are duplicative.		No action required.
2286181	F8	Supplemental data required for quarter 1, but not collected or entered into ASSET.		Collect supplemental data, upload any documentation into ASSET, and enter wages into Quarter 1 Follow-Ups.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2402301	AC1	<p>The ISS from the service dated 10/27/2020-10/28/2020 was signed via email on 10/29/2020.</p> <p>Adult Mentoring: There is no indication in the file to support that this service is being provided on the dates entered.</p> <p>Career Awareness, Exploration and Counseling was opened on 9/1/2020 with a planned close date of 6/30/2021. this service should be opened and closed on those dates when it is being provided.</p> <p>Supportive Services: The service for transportation was opened on 9/23/2020 with a planned close date of 6/30/2021. The service for the laptop was open from 10/27/2020-12/20/2020, the service for the Fresh Start needs was open from 9/17/2020-11/8/2020. Have service dates this long can make it difficult to review the accuracy of the file.</p> <p>Incentives service was opened on 9/1/2020 with a planned close date of 6/30/2020. The file does not support those entries as there is no indication in the file that these services have been provided yet. Case note 12/16/2020 is first time that the participant indicates they will work towards incentives.</p>		<p>ISS: Correct the ASSET record so that the service close date matches the date the ISS was signed.</p> <p>Adult Mentoring: Correct the ASSET Record. If the Fresh Start teacher in the mentor, then the dates should match the Fresh Start dates. NOTE: Adult Mentoring is required to last at least 12 months.</p> <p>Career Awareness, Exploration and Counseling: Correct the ASSET Record</p> <p>Supportive Services: Open and close the transportation service to show when the service is actually provided. No changes needed for the other services at this time.</p> <p>Incentives: Correct the ASSET record to reflect when the incentives are paid. These services may need to be changed to planned services only if they have not been earned yet.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2402301	F10	<p>Some case notes entered untimely: Case notes entered on 3/3/2021 for 2/16/2021 and 2/11/2021</p> <p>Case note entered on 2/4/2021 seems to be about a service conducted on 12/14/2020. Additionally, the certificate for this service is unsigned and contemporaneous cases notes do not support that this service was provided in December 2020.</p>		No action required.
2402301	F2	<p>Contact is not maintained bi-weekly as required by the service provider contract: There is no recorded contact between 10/29/2020 and 12/10/2020.</p> <p>The case note about an email on 12/24/2020 appears to be an email sent to all Fresh Start participants. No attempted contact to this participant between 12/16/2020 and 1/7/2021 or between 4/19/2021 and 5/10/2021</p>		No action required.
2402301	F6	No documentation found uploaded to support eligibility.	\$1242.00 known Supportive Service \$300 known WEX	Upload required documentation that shows that this participant is both eligible to work in the United State and is of the correct age to be enrolled in the Youth program.
2402301	AC3	No Babel Notice was seen in this file.		Provide the Babel Notice to the participant and add to the participant file.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2402301	AC3	It is unclear on the application what the participant's and family income are. The annualized total of \$27,520 does not match the information on the table.		No action required.
2402301	AC3	The ISS for the service dated 12/16/2020 was not seen in the documents uploaded into ASSET. Education Offered Concurrently with Workforce Preparation Activities for a Specific Occupation: The ASSET record does not support that this service was provided. It appears to be Career Awareness, and Exploration		ISS: Upload the ISS for this service or correct the ASSET record. Education Offered Concurrently with Workforce Preparation Activities for a Specific Occupation: provide support that this element was provided or correct the ASSET record.
2402301	F3	The voucher in the file for the laptop provided to the participant is and "Unsigned Client Copy"	\$382.00	Provide the signed voucher
2402301	F9	The only TABE record in the file is a printout from The retest in 3/9/2020.	\$1242.00 known Supportive Service \$300 known WEX	Upload the TABE that was Used as the objective assessment in August 2020

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2402301	F7	<p>Agreement does not have an academic component, only training for the position.</p> <p>WEX is receptionist which does not tie to the Career Goal of translator on the participant's ISS</p>	<p>\$300.00 known at the time of monitoring.</p>	<p>Provide support that this WEX is tied to the participant's goals.</p> <p>Provide support that there is an academic component to this WEX that and that the academic and occupational education components of this participant's work experience relate to the same specific job or occupational area.</p> <p>Provide updated expenditures for this participant if she continued with the WEX after the date of monitoring.</p>
2408761	AC1	<p>Actual Open Date for Objective Assessment service should be 8/13/2020.</p>		<p>Correct ASSET entry.</p>
2408761	AC1	<p>ISS Review Actual Close Date should be 1/12/2021 based on participant's email attestation.</p>		<p>Correct ASSET entry.</p>
2408761	AC1	<p>Little information to support Career Awareness, Exploration, and Counseling service entry. Service is being held open.</p>		<p>Close service on the last date of service provision.</p>
2408761	AC1	<p>Case note indicates voucher for Fall 2020 support for books was waived. The 8/17/2020 service should close on the date of the voucher, and the completion code should be changed to "Will Never Start" to reflect what actually occurred. Spring 2021 books should be entered as a separate service.</p>		<p>Correct ASSET entry and enter ASSET service for spring 2021.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2408761	F2	No attempted contact since 3/29/2021.		Contact participant in compliance with local policy and/or contract for the remainder of participation.
2408761	TA1	DL and SS card not marked "For Administrative Use Only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
2408761	TA1	Career planner completed Doc Verification Form and retained source documentation in case file. Practice is duplicative. Career planner also completed I-9 to verify citizenship, which is not required		No action required.
2408761	F9	ISS close date should be 8/22/2020 and participation date should be 8/22/2020 based on ISS signature.		Correct service close date and participation date.
2414810	AC1	This service has an Actual Open Date of 9/24/20 and a Planned Close Date of 6/30/21. Adult Mentoring must take place for at least 12 months. It is also not clear from the file what activity supports the Adult Mentoring service.		Ensure that the activities fall under the requirements of Adult Mentoring. If they do, make sure those activities continue for at least 12 months. It may continue during follow-up if necessary.
2414810	AC1	The Initial Assessment form was signed by the participant on 9/3/20. This means that an assessment was given prior to eligibility determination. The Objective Assessment service in ASSET has an Actual Open Date of 9/24/20, which is incorrect based on the signature and date on the Initial Assessment form.		Change the Actual Open Date of the Objective Assessment to 9/3/20.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2414810	AC1	The ISS Review service has Actual Open and Close Dates of 10/27/20 but the uploaded IEP was signed 10/28/20.		Change the dates of the ISS Review service to match the date on the document.
2414810	AC1	The Career Awareness, Exploration and Counseling service was opened with an Actual Open Date of 9/24/20 and a Planned Close Date of 6/30/21.		Check the case notes and open and close this service whenever the CP actually "help[ed] youth make appropriate decisions about education/training and careers by providing them with information, advice, and support." If the service was never provided, Change the Actual Open date to a Planned Open date and add the Completion Code, "Will Never Use This Service."
2414810	AC1	The interview preparedness, work expectations and financial literacy workshop does not meet the definition of Education Offered Concurrently with Workforce Preparation Activities for a Specific Occupation. This appears to be preparation for the work experience, so it counts as part of the work experience and the start date of the work experience service should be adjusted to include this workshop.		Adjust the Actual Open Date of the Work Experience service to include this workshop, remove all actual dates for the Education Offered Concurrently with Workforce Preparation Activities for a Specific Occupation service, and change the Completion Code to "Will Never Start This Service."
2414810	AC1	The Fresh Start HSED service may also be able to be entered into ASSET as Tutoring, Study Skills Training, Dropout Prevention.		Check the definition of Program Element 1 in DWD's WIOA manual, assess whether it matches the service provided in this case, and add it if appropriate.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2414810	F6	None of the assessment forms assess prior work experience, which is a required part of the objective assessment. This is usually collected on the application form.	\$4,136.60	Upload the application form or some other assessment of the participant's prior work experience or transfer all expenses for this participant to non-WIOA sources.
2414810	AC3	No application form was seen in the documents uploaded.		Upload the application form.
2414810	AC3	No worksheet for income was uploaded, so the monitor is unable to determine if family and individual income were calculated correctly.		Upload the application form.
2414810	AC3	Monitor is unable to determine if the public assistance ASSET entries match the file documentation.		Upload the application form.
2414810	F3	There are no Work Experience attendance records between 1/31 – 2/14/21 to support the gas vouchers.	\$40 known	Upload the missing attendance records and provide a full accounting of the funds spent on gas vouchers during that time period. If the amount spent exceeds local spending limits transfer them to a non-WIOA source, and submit a copy of the GL.
2414810	F8	The TABE shows an MSG but is not entered into ASSET as an MSG.		Enter the TABE results into ASSET as an MSG.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2414810	F7	(1) The service was still open during monitoring, but the end date of the agreement is 4/15/20. (2) The work experience is not related to the participant's ISS goal of working in a medical field. (3) there is no educational component to the work experience. (4) The work experience does not appear to have been monitored by the career planner. (5) There were no timecards seen for the period from 1/31-2/14/21.	\$3546.60 known	Correct the ASSET Record. Provide supporting documentation that this activity meets the definition of a work experience. If documentation is not available, provide a full accounting of the funds spent on the work experience and supportive services in support of the work experience and transfer the funds from a non-WIOA source. Submit a copy of the GL with the response to this report.
2427448	F6	UI eligibility/exhaustion, and unlikely to return criterion not documented in case file. Participant was a welder, so unclear why he couldn't obtain another welding job. Individual is not eligible as a DW. Potential for questioned costs.	unknown - training and support	Upload sufficient documentation to ASSET to establish Category 1 DW eligibility. Provide an accounting of direct costs spent on this individual for DWD-DET review.
2427448	TA1	DL and SS card not marked "For Administrative Use Only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
2427448	TA1	Career planner completed I-9 as part of intake process.		No action required.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2427448	F3	No voucher seen uploaded into ASSET. Cannot determine amount of direct costs spent on training or whether those costs are in compliance with local policy limits.	TBD	Upload all training documentation into ASSET and provide the total expenditures with the response to this report. If the amount spent exceeds local spending limits transfer them to a non-WIOA source, and submit a copy of the GL.
2427448	F9	Comprehensive Individualized or Specialized Assessment Service should have an open date of 11/17/2020, and the participation date should be 11/17/2020.		Correct ASSET entry, and participation date.
2427748	F3	No voucher seen uploaded into ASSET. Cannot determine amount of direct costs spent on support or whether those costs are in compliance with local policy limits.	TBD	Upload all supportive services documentation into ASSET. Provide an accounting of direct supportive service costs spent on this participant with the response to this report. If the amount spent exceeds local spending limits transfer them to a non-WIOA source, and submit a copy of the GL.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2428867	AC1	<p>The ASSET record and uploaded documents do not support the dates of the following services.</p> <p>Supportive services (11/11/2020-12/16/2020) - laptop</p> <p>Supportive Services 11/11/2020-12/20/2020 – uniform for Fresh Start</p> <p>Career Awareness, Exploration and Counseling (11/11/2020- planned close of 6/30/2021). The ASSET record supports the open date but not the continued open status.</p> <p>Supportive Services (11/11/2020- planned close of 6/30/2021)</p> <p>Incentives (11/11/2020- planned close of 6/30/2021)</p> <p>Adult Mentoring (11/11/2020- planned close of 6/30/2021)</p> <p>Youth Build (11/11/2020- planned close of 6/30/2021) It appears that this is for Fresh Start. It is not clear what date Fresh Start begins.</p>		<p>Of these services only Career Awareness, Exploration and Counseling appear to have been provided on 11/11/2020.</p> <p>Correct the ASSET record to show the dates that the services were actually provided.</p> <p>Adult Mentoring: Correct the ASSET Record. If the Fresh Start teacher in the mentor, then the dates should match the Fresh Start dates. NOTE: Adult Mentoring is required to last at least 12 months.</p>
2428867	AC1	<p>The date entered for the TABE appears to be the date of the report in the file, not the date of the Assessment</p>		<p>Correct the ASSET record to show the date of the TABE assessment</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2428867	AC2	<p>The initial assessment shows that the participant needed support regarding Housing, medical insurance (including info on it), a computer, work clothes, and work tools/equipment.</p> <p>There is no indication in the file that housing or medical insurance support/information was discussed.</p>		<p>Discuss with the participant what their needs are in the areas indicated in the Initial Assessment and record this in case notes.</p>
2428867	F10	<p>Not all case notes entered timely 4/27/2021 for 4/15/2021 2/23/2021 for 2/11/2021, 1/27/2021</p>		<p>No action required.</p>
2428867	F2	<p>Contact is not maintaining bi-weekly as required by the service provider contract Case notes show: No contact attempted between 12/10/2020 and 1/27/2020/2020. The case note on 12/10/2020 indicates that the communication put in the virtual portal was for everyone [not specific to this participant] No contact attempted between 2/23/2021 – 3/16/2021</p>		<p>No action required.</p>
2428867	TA2	<p>In an email sent to the participant there appears to be a screen shot of the ASSET Services screen. It appears that the email is supposed to represent and ISS.</p>		<p>No action required for this PIN. Staff should be trained on the new Data Sharing Agreement and discontinue this practice.</p>

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2428867	F6	Appropriate Selective Service documentation not seen in the file. It is noted on two forms that sss.gov was accessed but neither form has a printout from the site as required	\$1,162.00	Upload allowable documentation to verify correct Selective Service Status.
2428867	AC3	No Babel Notice was seen in this file.		Provide the Babel Notice to the participant and add to the participant file.
2428867	F9	No ISS was seen in the documents uploaded or in CEPT.	\$1,162.00	Upload ISS that was developed with the participant to demonstrate that all steps to participation were provided. If documentation is not available, transfer funds to a non-WIOA source, and submit a copy of the GL with the response to this report.
2429959	AC1	The ITA Program Outcome and ITA Employment Outcome in the Occupational Classroom service are both "pending" even though the service is closed.		Complete the ITA Program Outcome and ITA Employment Outcome in the Occupational Classroom service.
2429959	AC1	The participant's budget analysis showed that her monthly income was about \$600 short of her monthly expenses, so she may have benefitted from supportive services beyond the transportation assistance she received. The participant gained her CDL on 3/1/21, but there is no indication in the file that she is employed, and she has not been contacted since that time or offered any career services to help her find employment.		Contact the participant and offer any job search assistance she may need. If she continues in the program, offer additional supportive services as appropriate.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2429959	TA1	Copies of the Social Security Card and driver's license must be marked, "for administrative use only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.
2429959	F9	The Initial Assessment was given before the Eligibility Determination was complete.		Change the Actual Open Date of the Comprehensive Individualized or Specialized Assessment to 11/7/2020 to match the date of the first assessment given.
2429959	F8	The participant earned a CDL, but this is not recorded as a credential in ASSET.		Enter the CDL as a credential in Manage Follow-ups.
2429959	F5	No indication was seen in the case notes indicating that the participant was informed of her priority level.		Exited file - no action required.
2439351	AC1	Service Open Date of Comprehensive, Individualized or Specialized Assessment should be 12/11/20, not 12/21/20, to accurately reflect the documentation in the file.		Correct the ASSET record.
2439351	F11	Participant file contains an unsigned copy of the ESS calculation. CEPT does not reflect that the ESS calculation was accepted.	\$1,250.00	Have the participant acknowledge the ESS calculation, either in CEPT, via email, or by signing a printout. This must be done before funding any additional training through WIOA.
2439351	TA1	Driver's License and Social Security Card and not marked "For Administrative Use Only."		Add "for administrative use only" to Driver's License and Social Security Card in ASSET.
2440400	AC1	Service Open Date of Initial Assessment of Interests, Skill Levels and Supportive Service Needs should be 01/05/21, not 01/07/21, to accurately reflect the documentation in the file.		Correct the ASSET record.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2440400	F11	Participant file contains an unsigned copy of the ESS calculation. CEPT does not reflect that the ESS calculation was accepted.		Have the participant acknowledge the ESS calculation, either in CEPT, via email, or by signing a printout. This must be done before funding any training through WIOA.
2440400	AC3	Local application form, including income calculation, not seen in documents uploaded into ASSET. File does not contain documentation to support that participant is receiving SSDI.		Upload the following to the participant's electronic record: WIOA application; acceptable documentation of SSDI receipt; and documentation of participant's acceptance of ESS calculation (signed calculation, emailed acknowledgement in lieu of signature, acceptance via CEPT).
2440400	TA1	Driver's License and Social Security Card and not marked "For Administrative Use Only."		Upload DL and SS card marked "For Administrative Use Only" and delete existing documents.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2447873	AC1	<ul style="list-style-type: none"> • Income was properly calculated, but ASSET has incorrect values for Family Income Previous 6 Months and Individual income Previous Six Months. Both should state "Neither of the Above." • Program element Education Offered Concurrently with Workforce Preparation Activities for a Specific Occupation: Actual Service Close Date of 03/01/21 is not supported by the documentation in the file. • Program element Supportive Services was recorded twice for 02/17/21. Both services were planned at time of review so should not have Actual Open Dates recorded in ASSET Manage Services until the service has begun. 		Correct the ASSET record.
2447873	AC3	<ul style="list-style-type: none"> • File does not contain documentation to support that participant is receiving FoodShare. • Participant record does not substantiate provision of Career Awareness, Exploration, and Counseling program element. 		Upload the following to the participant's electronic record: acceptable documentation of FoodShare receipt documentation of Career Awareness, Exploration, and Counseling program element. If program element was opened in error, correct the ASSET service record.
2447873	TA1	DOT Instructional Permit and Social Security Card and not marked "For Administrative Use Only."		Add "for administrative use only" to DOT Instructional Permit and Social Security Card in ASSET.

PIN	F/AC #	Condition	Questioned Costs	Corrective Action
2447873	F7	<ul style="list-style-type: none"> The participant file contained only pages 1 and 2 of 9 total pages of the work experience agreement (per agreement footer). Without comprehensive documentation, the requirements of a WIOA-funded work experience could not be substantiated. The participant's career goal is to be a landscaper, and the work experience was shelving books in a library for a total of one hour of work experience. While there is no minimum hours for a work experience, file did not demonstrate how a one-hour work experience could provide the participant with career exploration and/or skill development. Job Shadowing may have been a more appropriate type of Work Experience than the selected Employment Opportunity, given the short time frame. The file does not substantiate that the academic component of the work experience was provided as required. The file does not substantiate that the work experience was monitored or how the WDB would ensure that the work site is providing quality services in order to determine whether future work experiences with other participants would be appropriate. 	\$8.07	Upload comprehensive documentation of work experience, including missing pages of work experience agreement (pages 3-9).

Attachment B: Itemized Checklist of Corrective Actions

This section contains an itemized checklist of Corrective Actions for issues identified during monitoring not related to file review.

- Review the forms and practices in Technical Assistance 1 and provide guidance to service providers on any updates to forms and practices.
- Train staff regarding Data Sharing agreements.
- SWWDB must provide technical assistance to subrecipients to make their websites accessible in compliance with Section 508 or W3C's (WCAG) 2.00 AA.
- Incorporate the offer of language assistance to the EO tagline and accessibility statement. Submit revised versions of the outlined documents showing the updated EO tagline.
- SWWDB must provide timely responses to future DWD-DET requests for information.
- Review all PINs of WIOA participants served on July 1, 2020 (DWD-DET will provide a WEBI report with a list of PINs to check). In ASSET, mark as confidential uploaded documents that contain disability and medical information. Develop or modify policies and procedures for staff to follow in collecting and maintaining disability and medical information.