
REGION 16

Hernando, Pasco



[Pasco-Hernando Jobs and Education Partnership Regional Board, Inc.](#)

WORKFORCE SERVICE DELIVERY QUALITY ASSURANCE REPORT



PREPARED BY THE AGENCY
FOR WORKFORCE INNOVATION

APRIL 12, 2010

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**PASCO-HERNANDO JOBS AND EDUCATION PARTNERSHIP REGIONAL BOARD,
INC.**

REGION 16

QUALITY ASSURANCE REPORT

INTRODUCTION

The following report was prepared as a result of the quality assurance review conducted January 11 through January 15, 2010 for the following programs administered by the Pasco-Hernando Jobs and Education Partnership Regional Board, Inc. (PHJEPRB): Food Stamp Employment and Training (FSET), Wagner-Peyser (WP), Welfare Transition/Temporary Assistance for Needy Families (WT/TANF), Workforce Investment Act (WIA), any Programs funded by the American Recovery and Reinvestment Act (ARRA), Trade Adjustment Act (TAA), and any special projects.

The review team consisted of Mary Blake, Ken McDonald, Bettye McGlockton, Aisha Mercer, and Ken Williams.

PURPOSE AND SCOPE OF THE REVIEW

The Agency for Workforce Innovation's (AWI) quality assurance team reviewed the funded activities, services, program administration and management practices for the WIA, ARRA, WT/TANF, WP, FSET, TAA, and any special projects for the review period of January 1, 2009 through September 30, 2009. The purpose of the review was to provide an assessment of whether PHJEPRB's programs operated in compliance with each program's respective laws, regulations, state plans, and any contract or agreement terms.

The scope of the review included an entrance conference, desk reviews, case file reviews, staff interviews, one-stop credentialing, and an exit conference. The reviewers also provided daily updates to PHJEPRB staff in an effort to keep them informed of the team's progress, to allow PHJEPRB staff the opportunity to provide supporting documentation to resolve any outstanding issues which may have been observed, and to highlight any notable observations and/or practices that may have been implemented by the Board. The AWI's monitoring review tools were used to conduct the review. The tools are designed to provide a comprehensive review of the processes and procedures used by Board staff to operate and manage the programs.

Entrance Conference

An entrance conference was conducted on January 11, 2010 with the following PHJEPRB representatives: *Jerome Salatino, Joe Mascaro, Brenda Gause, Paul Kendrick, Joyce Headrick, Michele Storms, Stacey Fussell, Elizabeth Holtman, Jonathan Breem, and Kenneth Russ.* The purpose of the entrance conference was to introduce the members of the AWI team performing the

review, identify PHJEPRB's contact person(s) with whom the reviewers would communicate, discuss both PHJEPRB's and AWI's expectations, schedule site visits and interviews, establish a timeline for daily updates, and identify/obtain documents requested in the on-site notification letter.

Exit Conference

An exit conference was conducted on January 15, 2010 with the following PHJEPRB representatives: *Brenda Gause, Joe Mascaro, Paul Kendrick, and Phyllis Marty*. During the exit conference, PHJEPRB representatives received a written exit report that included a summary of issues that were identified and discussed during the daily briefings, as well as a summary of corrective actions that may be required. The written exit summary was provided for the purpose of discussion and to allow PHJEPRB staff to take corrective action and/or present backup documentation to resolve any of the preliminary summary findings. The PHJEPRB was given ten workdays to respond to the preliminary exit report summary. PHJEPRB representatives were also provided completed review tools for the various programs.

METHODOLOGY

In conducting the review of PHJEPRB's program administration and service operations, the AWI team reviewed participant case files, Management Information System (MIS) data, local plans and reports, and conducted on-site visits to PHJEPRB's local one-stop career centers. The on-site analysis process allowed the review team to verify program data collected during the desk review by reviewing hard (paper) copy and electronic participant case files kept at the local one-stop career centers.

The team also reviewed PHJEPRB's previous year's monitoring report and Corrective Action Plan (CAP) to determine whether the Board had implemented the actions proposed in its CAP to satisfactorily resolve any deficiencies cited in the report. The team further conducted staff interviews with program managers, supervisors and/or front-line staff to gather information about program processes and service delivery strategies. The results of the interviews are incorporated into this report by the related subject and program area.

Members of the review team also provided technical assistance to program and/or Board staff during the on-site visit. Technical assistance covered topics related to several different programs to ensure that staff had a better understanding of the specific elements of the programs' services and activities.

Sample Size/Selection Methodology

The participant case file review sample size was determined based on the total participant population served by the respective programs for the review period. This population is based on data entered into and captured by the automated data systems for each program. The final sample was randomly selected from participants entered into the State's MIS for each program using a 95 percent confidence level and a 12 percent confidence interval.

REGION 16 PROFILE

The PHJEPRB's geographical service area consists of Hernando and Pasco Counties with a population in 2009 of approximately 604,750 persons. The unemployment rate for the region for the month of February 2010 (not seasonally adjusted) was 14.6 percent with 38,405 individuals in the labor force unemployed. This percentage was higher than the State's unemployment rate of 12.2 percent, and higher than the national rate of 10.4 percent for the same month. The total number of jobs located in the service area in September 2009 was 130,312. The largest major industry sector was Trade, Transportation, and Utilities with 29,371 individuals employed, followed by Education and Health Services with 24,977 individuals employed. The fastest growing occupation is Home Health Aides, and the occupation with the most new jobs is Retail Salespersons.

The region's average annual wage for 2008 was \$31,976 while the State's average annual wage was \$40,579.

QUALITY ASSURANCE REVIEW SUMMARY AND FINDINGS

The quality assurance report details programmatic findings, systemic issues, and observations; as well as recommendations and suggestions on how to address any identified finding, systemic issue or observation. Programmatic findings are instances where noncompliance with requirements contained in federal or State law, regulation, administrative code, guidance or other document is found. Findings are reported regardless of the percentage of applicable participant case files found to be in noncompliance and are expected to be responded to in the CAP. Systemic issues are elements found within the program operations that may lead to a finding or other reporting/performance issue if not corrected. Systemic issues are only reported if found in at least 20 percent of the applicable participant case files reviewed. Observations are informative statements and are made to identify processes that, when improved, can result in positive program outcomes. Observations are also made to recognize and promote notable program practices and processes in the Region. Systemic issues and observations are not expected to be responded to in the CAP.

The outcome of the review is detailed in the following sections identified by the respective program.

General Note: It should be noted that several participant hard (paper) copy case files could not be located during the course of the on-site review. However, PHJEPRB located the missing files and provided copies of the case file contents to AWI during the ten-day response period to resolve the issue. In the future, PHJEPRB should ensure that all participant case files can be retrieved in a timely manner and that a system is in place to safeguard records from being lost or misplaced. This is required not only for audit and review purposes, but also to ensure that adequate records are available should a grievance be filed. This will also prevent any potential questioned and/or disallowed costs.

WELFARE TRANSITION (WT)

The sample size consisted of 65 participant case files (12 of which were special projects).

The WT team reviewed program processes and Local Operating Procedures (LOP), including but not limited to the following: the initial and any subsequent assessment processes, the processes for developing the Individual Responsibility Plan (IRP) and the IRP tool used locally, the process for the development of work activities and assigning participants to work activities, the process for offering support services to program participants, and the process for offering employment services to WT participants.

The WT team also reviewed participant case files which included information contained in both the hard copy (paper) case files and the electronic case files in the One-Stop Service Tracking (OSST) system. Each participant case file was reviewed to determine if the participant was served as an applicant, mandatory participant or transitional customer. If the individual was served as an applicant of Temporary Cash Assistance (TCA), the case file was reviewed to determine if the participant was approved for a diversion payment or service. If the individual received time-limited cash assistance and was mandatory for greater than 30 days during the review period, the team looked for an initial assessment and a signed IRP in the participant's case file. The team also reviewed the participant case files for documentation to support the hours entered into the OSST system for participation credit. The team further reviewed activities recorded in the OSST system to ensure participants were engaged in activities that met federal definitions. Participant case files that indicated the participant was engaged in "work" by the RWB, as defined by the United States Department of Labor (USDOL), were reviewed for compliance with the Fair Labor Standards Act (FLSA).

The team reviewed information pertinent to the counseling and penalty process if the participant was cited for failing to participate in countable work activities. If the participant received transitional services or was engaged in a special project funded by the TANF program, the participant's case file was reviewed for documentation to support eligibility.

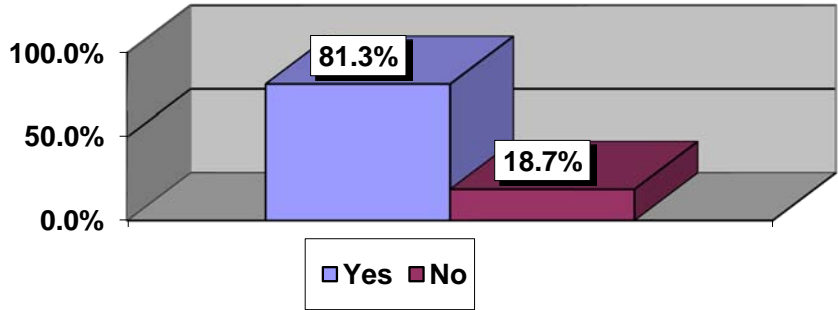
Finding WT 16-01

Initial Assessment and Individual Responsibility Plan

Applicable reference: 45 CFR 261.11, 261.12, 261.14.

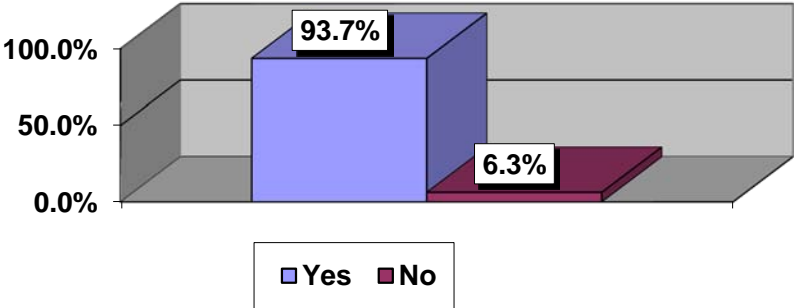
Federal law requires an initial assessment of the participant's employability, work history, and skills be completed within 30 days of becoming eligible. Twenty-six participant case files reviewed were coded as mandatory, open greater than 30 days, and/or were assigned to countable work activities by staff during the review period. If the case was open more than 30 days and/or the participant met with staff and was assigned to work activities, the participant's case file was reviewed for a completed initial assessment as required under federal law. Of the 26 participant files that were mandatory and open more than 30 days during the review period, 16 were required to have an initial assessment completed within 30 days of becoming eligible for cash assistance and receiving the case from DCF. Thirteen (81.3 percent) of the applicable participant case files had an initial assessment completed within 30 days from the open/reopen date posted in the OSST system and three (18.7 percent) did not. The results are shown in Figure 1 - TANF.

Figure 1 - TANF : Was an initial assessment completed within 30 days of becoming eligible for cash assistance?



Based on [federal regulations](#) and Florida’s TANF State Plan, information compiled from the initial assessment should be used to design an Individual Responsibility Plan (IRP) or a “road map” to self-sufficiency. Of the 26 participant case files that were mandatory during the review period and open more than 30 days, 16 were required to have an IRP signed by the program participant during the review period. Of the 16 participant case files reviewed for a signed copy of the initial or updated IRP, 15 (93.7 percent) had an IRP signed during the review period and one (6.3 percent) did not. It should be noted that two participant case files did not have either an initial assessment done before completing the IRP or the assessment used to complete the IRP was not in the file. The results are shown in Figure 2 - TANF.

Figure 2 - TANF: Was a signed copy of the IRP retained in the participant case file during the review period?



Recommendation: Staff should be reminded that the initial assessment should be completed within 30 days of the participant’s case becoming mandatory. Staff should ensure that an IRP be completed for all mandatory program participants who have met with program staff and were assigned to a work activity. Although technical assistance was provided to program staff regarding the work registration process, program staff should be trained and knowledgeable on the following:

- how to review the initial assessment tool with the program participant and update the tool with relevant information;
- how to enter barriers and goals in the OSST system and assign activities that are relevant to the participant’s barriers and goals;
- how to recognize when the participant/ family needs supportive services;

- how to recognize the most appropriate activities for the program participant and assign clear deadlines;
- how to write clear directions in the “steps to self-sufficiency” section of the IRP tool; and
- when and to how to update the steps to self-sufficiency.

1. **Corrective Action:** - WT 16-01 Initial Assessment and Individual Responsibility Plan

- 1. A. – Upon receipt of a ‘new’ or ‘reopen’ alert, an initial assessment will be completed within the thirty (30) day period. Actions to be taken to preclude recurrence are, but not limited to:
 - Include new/reopen data to case managers in weekly and/or semimonthly reports to provide increased visibility for planning purposes.
 - Increase specific (targeted) file reviews utilizing new / reopen case data for sampling purposes to verify compliance with the thirty (30) day requirement.
- 1. B. – When a TCA recipient’s status changes to mandatory, an IRP will be completed and placed into the case file at the first appointment date. The IRP creation being coordinated with the assessment (per above) will assure compliance within the thirty (30) day window as well as provide increased correlation between the assessment and the IRP.

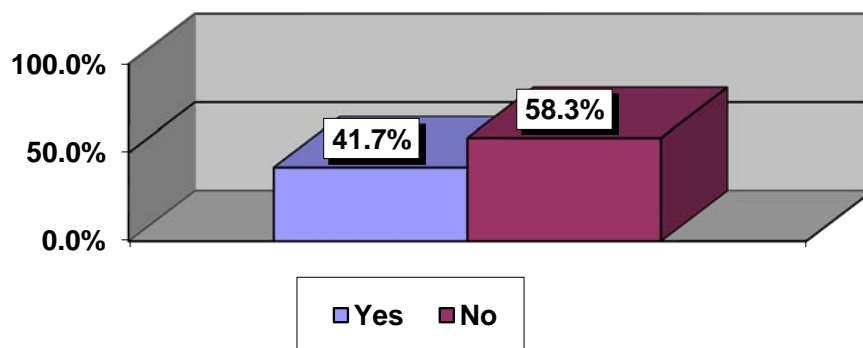
Finding WT 16-02

Documentation of Hours Recorded on the Job Participation Rate Screen

Applicable reference: 445.010, F.S.

Federal and State law requires work activities and participation hours recorded in OSST be documented and auditable. Program staff enters hours of participation on the Job Participation Rate (JPR) screen in OSST and this data is used to report performance (participation rates). Twenty-four participant cases had hours archived in the participation rates’ full file. Those 24 participant case files were reviewed for documentation to support JPR entries that were archived when the participation rates were calculated 40 days after the end of the applicable quarter. At the time of the review, ten (41.7 percent) participant case files contained documentation to support hours for each of the weeks recorded on the JPR screen and 14 (58.3 percent) did not. The results are shown in Figure 3 - TANF.

Figure 3 - TANF: Were reported participation hours (JPR) supported by documentation/verification?



Recommendation: In order for Florida to retain its full block grant amount, documentation to support hours of participation reported must be retained in the participant’s case file according to

federal guidelines. Hours of participation must be documented and verified by a designated party, and time sheets and other participation documentation must be completed appropriately (i.e., the weeks being verified and signatures on documentation). Additionally, staff must ensure that documentation or other forms of allowable verification as described in the approved Work Verification Plan are retained in the participant's case file. Local quality assurance program staff should monitor participant case files on a regular basis to ensure hours of participation in countable work activities are documented.

2. **Corrective Action:** - WT 16-02 - Documentation of Hours Recorded on the Job Participation Rate Screen

- The Quality Assurance Manager shall develop and deliver specific training emphasizing:
 - Requirements review per 445.010, F.S.
 - Review and sign off of the Career Central SOP 'JPR Documentation/Verification Standards'
 - Interpretation of pay stubs / application of employment hours
 - Data quality techniques for review of received documentation (e.g. - timesheets)
- The Quality Assurance Manager will obtain a sample of cases (for each Career Manager) one (1) month after training is completed to assure hours are documented in accordance with requirements.

Finding WT 16-03

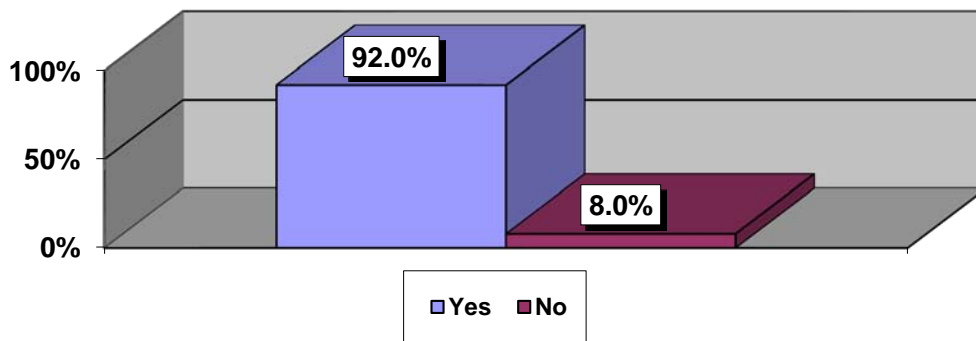
Pre-penalty and Sanction Process

Applicable reference: 45 CFR 261.10, 261.12, 261.13, 261.14, F.S. 414.065, Florida Administrative Code 65A-4.205 and Work Penalty Guidance.

Federal law requires the State to initiate its penalty process if the participant refuses to comply with work requirements or fails to comply with his/her signed IRP. Twenty-five of the 26 participants who were mandatory during the review period were cited for failing to comply with a program requirement. The penalty process outlined in the Florida Administrative Code and AWT's final guidance paper was initiated in each of these 25 cases. The 25 participant case files were reviewed to ensure the counseling process was implemented according to Florida Administrative Code and AWT guidance. The following was noted:

- Of the 25 participant case files that had a pre-penalty initiated, 23 (92 percent) had an oral contact attempt documented in the system and two (8 percent) did not. The results are shown in Figure 4 - TANF.

Figure 4 - TANF: Did program staff attempt to contact noncompliant program participants once the penalty process was initiated?



Technical Assistance: The review team advised PHJEPRB staff that an oral attempt must be made to contact the participant within ten days of mailing the Notice of Failure to Comply, AWI WTP Form 2290. Program staff was also informed that the pre-penalty process is to be initiated as soon as the participant fails to meet program requirements.

Recommendation: The PHJEPRB should remind program staff to make an oral attempt to contact and counsel a participant that is noncompliant with program requirements. An oral attempt is required as outlined in Florida’s State Plan and in AWT’s program guidance. It is also recommended that program staff be trained and knowledgeable on the sanction and counseling process.

3. Corrective Action: - WT 16-03 – Pre-penalty and Sanction Process

- Program staff have been reminded that an oral attempt must be made anytime a pre-penalty is requested, and specifically that the oral attempt is to be documented in a case note for traceability (evidence of action) purposes.
- The Quality Assurance Manager will conduct specific file reviews, utilizing pre-penalty data to verify proper case noting for oral attempts made.

Finding WT 16-04

Transitional Service Eligibility

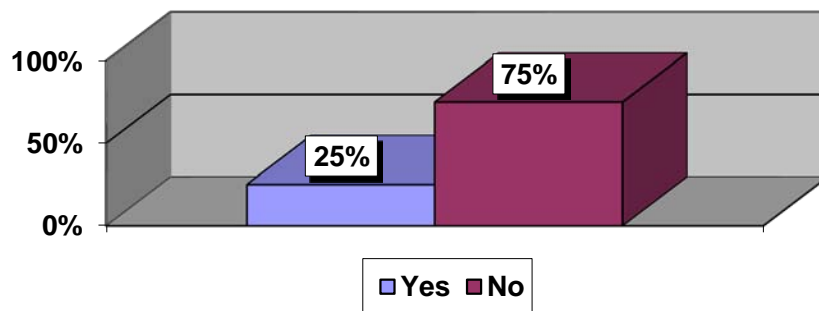
Applicable reference: 445.028-.32, F.S., 65A-4.218, and Transitional Childcare Guidance.

Twelve program participants were provided transitional services during the review period. Each participant case file was reviewed to ensure that:

- the program participant was eligible each time a “cash” benefit was issued (i.e., gas card or bus pass);
- the program participant was eligible the entire time (s)he was provided childcare assistance based on the period childcare was authorized; and
- a Notice of Change in Childcare Status was mailed if the program participant was no longer eligible for transitional childcare services.

Of the 12 participant case files reviewed, continuous eligibility of the above actions could be determined in three (25 percent) participant case files and could not be determined in nine (75 percent) case files. The nine transitional participants are receiving services without demonstrating continued eligibility which could potentially result in questioned costs. The results are shown in Figure 5 – TANF.

Figure 5 - TANF : Could continuous eligibility be determined for transitional services?



Technical Assistance: The review team discussed with PHJEPRB staff the importance of receiving documentation to support continued employment. PHJEPRB staff was informed that transitional services are to be terminated if documentation to support hours of employment is not provided in the timeframe outlined in the local operating procedure. It should be noted that PHJEPRB staff indicated that all transitional services would be reviewed more frequently for employment verification and all cases that lacked supporting documentation would be closed out in the OSST system.

Recommendation: The PHJEPRB must provide documentation to correct the noted deficiencies. Program staff should be reminded that participants must provide documentation of continued employment to receive transitional services. PHJEPRB staff should review participant case files each month to ensure program participants who are receiving services continue to be eligible. Additionally, PHJEPRB staff should be reminded of the following:

- Program participants, including transitional participants, should be seen by a “career counselor” each time a transitional service is provided. Transitional customers should present proof of continued employment each time a transitional service is requested. The career counselor is responsible for ensuring that the documentation is recent and relative to the time period in which the service is being provided.

4. **Corrective Action** - WT 16-04 - Transitional Service Eligibility

- The current process SOP for transitional participants will be reviewed and revised as necessary.
- The Quality Assurance Manager will provide specific training for program staff on requirements per 445.028-.32, F.S., 65A-4.218, Transitional Childcare Guidance, as well as implementation of the revised process.
- During internal monitoring of the WTP program, the Quality Assurance Manager will extract a separate sample of transitional cases to assure compliance with transitional service(s) eligibility requirements.

OBSERVATIONS

- The WT case files were not chronologically organized in either ascending or descending order. Rather, the documents were randomly placed in the files which extended the time required to complete the file review.

Suggestion: PHJEPRB program staff should develop a uniform filing system to allow easier access to participant information without looking through several sections of the folders to find documentation.

- Overall, the IRP's were detailed but there were instances where specific elements on the IRP were not completed:
 - services provided to participants by the WT program;
 - the number of hours assigned to each activity (per week); and
 - activities the participants were required to complete.

Suggestion: Program staff should be reminded to complete all of the elements specified on the WT tool.

- There were instances where employment information was entered in the OSST system without supporting information in the case file. Additionally, employment information entered in the system did not match employment information retained in the file.

Suggestion: Program staff must retain employment verification forms in the participant's case file when employment follow-ups are conducted. Staff should also ensure that information on the employment form matches information entered in the OSST system.

- In several instances, the reviewer observed that program staff were projecting employment hours incorrectly.

Suggestion: The PHJEPRB should remind program staff that employment hours may only be projected when an employment verification form has been received, a closure alert has been posted by DCF, and proof of actual hours for one full pay period has been documented. These hours can then be used to project future hours.

- In some instances, participants were not assigned to the right combination of hours to help meet the required hours for the month. Failure to engage participants to the correct number of hours has an impact on participation rates. Additionally, program staff are not calculating timesheet hours correctly and the JPR hours entered in the system do not match the hours on paystubs and job search forms. Employment paystubs are also being accepted without the participant's name or date indicated.

Suggestion: While this is not a finding or systemic issue, it is imperative that staff know how to properly assign participants to the right combination of hours to meet participation requirements. Program staff should be provided training on correctly calculating hours on paystubs and job

search forms. Additionally, all paystubs must provide the participant's name and the time period for which the participant was paid. If this information is not reflected, it cannot be accepted as auditable documentation.

- Job search forms are being accepted without the participants signing the customer statement section attesting to actually applying for the jobs identified on the forms.

Suggestion: All job search forms must be signed by the participant before the hours can be counted for JPR purposes. Additionally, Florida's approved Work Verification Plan requires that program staff validate ten percent of job search entries entered on job search logs. PHJEPRB staff should develop a process to conduct this job search validation for each participant engaged in job search activities. If the participants do not sign the forms and the job search entries cannot be verified, the hours cannot be counted towards participation.

- Program staff is automatically giving credit for unsupervised study time without verifying the hours.

Comment: Vocational education timesheets that were included in the participant case files reviewed did not display a section for unsupervised study hours. However, PHJEPRB provided the monitors with a copy of a revised vocational education timesheet that is currently being used which displays a section for supervised study hours.

Suggestion: Although the form had recently been revised, program staff should be reminded that they cannot automatically give credit for unsupervised study time. There must be a statement from the school requiring study time. Examples include a statement from the school, the course instructor or department head, or a class syllabus.

- There was an instance where a participant was approved for a \$1,000 up-front diversion payment. However, based on the information in the file, the participant did not have an ongoing means of support which is a requirement in order to be considered an appropriate candidate for up-front diversion.

Suggestion: Although the participant was eligible, program staff should ensure that participants have the means of supporting themselves after an up-front diversion payment is received. If a participant is unemployed and has no other income or has more bills than the up-front diversion payment can cover, program staff should not consider them appropriate candidates for up-front diversion.

- It was observed that medical documentation was not being kept in a separate file or in a secure location.

Suggestion: The PHJEPRB must ensure that all medical documentation is kept in a separate, secure location or placed in a sealed envelope in the participant's case file. This is the recommended practice to ensure confidentiality.

- 100% of all participants assigned to vocational education met the federal definition for this activity.

- 100% of all opportunities and obligation forms were signed.

NON-CUSTODIAL PARENT EMPLOYMENT PROGRAM

The sample size consisted of 12 participant case files.

The Non-Custodial Parent Program (NCPEP) is designed to offer innovative approaches to eligible, non-custodial parents to help them meet their parental obligations through adequate employment resulting from participation in programs that provide skills training and supportive services.

The team reviewed the PHJEPRB's NCPEP program to determine if participant eligibility was appropriately determined and that program enrollment dates in the system were entered on or after the eligibility determination dates.

The review did not reveal any findings, systemic issues, or observations.

FOOD STAMP EMPLOYMENT AND TRAINING (FSET) PROGRAM

The sample size consisted of 45 participant case files.

The FSET review focused on compliance with federal, State, and local FSET guidelines and requirements. Monitoring consisted of reviewing the methods of assignment, participation in and completion of program activities, assigning activities and hours of participation, and timely completion of sanction requests. When performing these procedures, the team verified data entered in the OSST system with documentation in the hard copy (paper) participant case files. The review team further examined FSET program activities, services and processes; as well as program administration and management practices in accordance with the program's local FSET Plan and operating procedures.

General Note: It should be noted that during this review period, only participant case files that were managed by program staff under the mandatory program were reviewed.

The review did not reveal any findings; however, the following issues were observed.

SYSTEMIC ISSUES

- Participants should be assigned to Work Experience (WE), Self-Initiated Work Experience (SIWE), or Education and Training (E&T) by the 31st day after the most recent referral. In a number of case files reviewed, participants were placed in Upfront Job Search (UJS)/WE-SIWE as the first activity; however, the activity did not end on or before the 30th day after the referral was posted. Additionally, it appears that some participants were assigned to and/or engaged in UJS/WE-SIWE well beyond the 30-day period which further resulted in participants not being placed in a countable activity by the 31st day.

Suggestion: When participants are assigned to UJS/WE-SIWE, staff should ensure that it ends on or before the 30th day after the referral has posted and that the participant is assigned to one

of the other countable activities by the 31st day after the most recent referral. Program staff should be mindful not to assign participants to UJS/WE-SIWE if the activity cannot be completed prior to 30 days after the referral is posted.

- Worksite agreements and job descriptions should be developed and maintained for participants engaged in work experience and assigned to work experience job sites. For those participants who were engaged in work experience, there were no worksite agreements or job descriptions available in the hard copy participant files.

Suggestion: In the future, staff should ensure that completed and signed worksite agreements and job descriptions are included in all case files or a central accessible location when individuals are placed at a work experience job site. Having a copy of the worksite agreement and job description in the participant's case file will eliminate confusion on the part of program staff, the employer, and participant related to contractual requirements and duties and responsibilities.

OBSERVATIONS

- Case notes reveal that there were some differences in dates for participant follow-up appointments. In addition, some case notes do not clearly indicate when follow-up appointments were scheduled with participants to return required documents.
- The Opportunities and Obligations and Assessment forms were not signed by the participant in one instance.
- It was observed that medical papers were loosely stored in one participant's case file and were not being kept confidentially in a separate location (i.e., sealed envelopes) within the participant's case file.
- The hours of participation were not recorded on the JPR screen for one participant.

Suggestion: Although the above observations were not systemic in nature, program staff should be reminded to review each case transaction to ensure that all activities are reviewed and appropriately recorded in the system. Program staff should also review the participant case files (OSST data entry and the hard file) for specific elements (e.g., case notes, dates assigned for follow-up appointments, required documentation to support all hours completed for an activity, signatures, etc.) before the participant is assigned to the next activity. This is particularly important since participant case files may be handled by more than one staff member.

WORKFORCE INVESTMENT ACT (WIA)

WIA Formula-funded Adult and Dislocated Worker Programs

The sample size consisted of 43 formula-funded WIA participant case files (36 adult and 7 dislocated workers).

The WIA review focused on compliance with federal, State, and local guidelines and requirements to ensure that all participant case files contain evidence that participants were eligible, enrolled in allowable activities, and that any training provided was in demand occupations provided by institutions on the State/local eligible training provider list. If employed workers were participating in skills upgrading training, the reviewers checked to see if the training was provided in response to the employer's assessment that such training was required for the workers referred. Additionally, if supportive services were offered to participants to enable them to successfully participate in training and other activities, the files were reviewed to ensure that the services were recorded accurately in the State MIS. The participant case files were further reviewed to determine if the participants who entered employment were placed in jobs that offered a self-sufficient wage as defined by local policy; if credential/certification attainment data were accurately recorded in the State MIS, and if follow-ups were performed at the required intervals.

The review did not reveal any findings; however, the following issues were noted.

SYSTEMIC ISSUES

Recording the Credential Attainment Date Correctly

Applicable reference: [AWI Guidance, TEGl 17-05](#).

- The case files for 21 participants who completed skills training were reviewed for documentation of a credential attainment and if the credential attainment data had been entered accurately in the State's MIS. Nine (42.9 percent) participant case files contained documentation that the credential attainment dates were recorded accurately in the State's MIS and 12 (57.1 percent) did not.

Suggestion: The PHJEPRB should ensure that the credential attainment dates on the credential documents are recorded accurately in the State MIS.

Program Follow-ups

Applicable references: [WIA Resource Guide, TEGl 7-99 and 1401, chg 1](#); the [United States Department of Labor's Training and Employment Guidance Letter, Number 17-05](#), dated February 17, 2006; and [AWI Memorandum entitled "Entering Case Follow-up in Employ Florida Marketplace," dated March 23, 2007](#).

Federal and State guidance requires quarterly follow-ups for participants exiting the WIA program. Fifteen of the 43 participant case files reviewed had exited the WIA program and were to receive 1st, 2nd, and 3rd quarter follow-up services based on exit dates during the review period. None of the exiters required a 4th quarter follow-up during the review period.

- Of the 15 case files reviewed to determine if 1st Quarter follow-ups had occurred, four (26.7 percent) contained evidence of 1st Quarter after exit follow-ups and 11 (73.3) did not.

Of the six exiters requiring 2nd quarter follow-ups, four (66.7 percent) contained evidence that follow-ups were performed and two (33.3 percent) did not. **Suggestion:** The PHJEPRB should ensure that follow-ups are conducted at the required intervals and that evidence of the follow-

ups is properly recorded in the State MIS. The WIA Exiters for Follow-Up report in the Employ Florida Marketplace (EFM) is a great tool that can be used to manage follow-ups.

WIA FORMULA YOUTH PROGRAM

The sample size consisted of 25 WIA participant case files (17 younger youth and eight older youth).

The WIA youth review focused on compliance with federal, State, and local guidelines and requirements to ensure that all participant case files contain evidence that participants were eligible. The review included the process for determining and documenting participant eligibility including low-income status, if the youth had at least one of the federal/local barriers, and whether the participant hard (paper) copy files substantiate program participation information recorded in the MIS. The review further focused on participation data to determine if the youth met age requirements for their respective customer groups and whether youth assessed as basic skills deficient (i.e., reading or math scores below the ninth grade level) received basic skills remediation to increase reading and math assessment results to the ninth grade level. If supportive services were offered to participants to enable them to successfully participate in training and other activities, the files were reviewed to ensure that the services were identified in the participant's service plans and that the services were recorded accurately in the State MIS. Additionally, the participant case files were reviewed to determine if attainment data on the credentials/certifications were recorded accurately in the State MIS and that all formula-funded youth exiting the program had received required follow-up services.

The review did not reveal any findings; however, the following issues were noted.

SYSTEMIC ISSUES

- None of the Individual Service Strategy (ISS) Plan forms in the participant case files included a date indicating when the form had been completed. Therefore, the reviewers could not determine if the ISS was completed within the required 30-day period.

Suggestion: The PHJEPRB should revise the ISS Plan to include a signature and date line to document when the form was completed and that the service was performed as required.

- State guidance requires employment verification in order to support a job placement that has been recorded in the State MIS. Participant case files should contain documentation of the job placement verification. The employment start date and wage rate should be accurately recorded in the State MIS to match the employment verification form in the file. Several of the MIS entries revealed that the hourly wage and/or employment start date was incorrectly recorded. Of the 25 participant case files reviewed for compliance with employment verification requirements, 12 (63.2 percent) case files had accurate information recorded in the system and seven (36.8 percent) did not.

Suggestion: The PHJEPRB should ensure that case managers are aware of the requirement to properly record job placement information in the State MIS. It is important that staff understands the negative impact this may have on performance reporting and data validation.

OBSERVATIONS

- Several participant case files did not contain a signed grievance/complaint form.

Suggestion: The PHJEPRB should ensure that all WIA participants are informed of the local grievance/complaint procedures. A signed copy of the grievance form attesting that the participant was informed of the local grievance procedure must be maintained in the participant's hard copy file.

- The reviewer noted that the document used to verify citizenship in one participant's hard copy file did not match the verification information recorded in the State MIS. It should be noted that the reviewer found another acceptable source document in the participant's hard copy file that could be used to document citizenship.

Suggestion: Eligibility documentation must be entered correctly and maintained in the participant's case file to substantiate a program eligibility item. The PHJEPRB should remind program staff that failing to enter correct data in the State MIS may negatively impact data validation results.

- A participant's case file revealed that the individual received an incentive supportive service, but the service was reported in the State MIS as a transportation supportive service.

Suggestion: The PHJEPRB should ensure that the correct types of supportive services are recorded accurately in the State MIS. Program staff should be reminded that documentation of the types of supportive services maintained in the hard copy case file should match what is recorded in the State MIS.

AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA)

WIA Adult and Dislocated Worker Program

The sample size consisted of 61 ARRA participant case files (20 Adults and 41 Dislocated Workers).

Finding ARRA 16-5

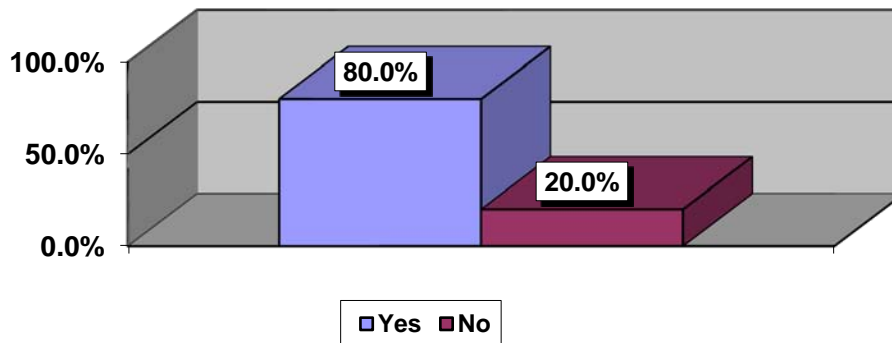
Income Guidelines for Adults

Applicable guidance: AWI 08-10 and AWI -09-16.

Federal and State law requires Regional Workforce Boards to adhere to the Poverty guidelines currently in effect when making a low-income determination for an adult participant. The low-income guideline for the regional workforce area is 100 percent of the Lower Living Standard Income Level (LLSIL). The reviewer noted that the RWB was using its local self-sufficiency definition which was defined as earnings at 200 percent of the LLSIL for employed participants. The RWB's self-sufficiency definition is only applicable to determining eligibility for training services for participants. Of the 20 adult participant case files reviewed to determine if the low-income

determination was accurate, 16 (80 percent) were accurate and four (20 percent) were not. The results are shown in Figure 6 - ARRA.

Figure 6 - ARRA: Were low income determinations made in accordance with federal and State guidelines?



Recommendation: Although the participants were determined eligible, PHJEPRB program staff should be aware of Poverty and Lower Living Standard Income Level guidelines that should be used when determining low income for Adult participants. It is important to ensure that staff and case managers perform the income calculations accurately.

5. **Corrective Action** - ARRA 16-5 - Income Guidelines for Adults

- Proposed corrective action to be taken in the event ARRA funding is provided in the future (current program year funding is extinguished):
 - Develop and implement a specific form to be used for ARRA income eligibility, and integrate into the relevant SOP(s). This form shall include a table of the applicable guidelines for all eligibility determinations.

Finding ARRA 16-6

Documentation of Selective Service Registration

Applicable Reference: 29 USC 2939(b) and AWI 05-10 Selective Services Registration, issued June 22, 2005.

The case file of a male participant did not include documentation of selective service registration as required by federal law and State policy.

Recommendation: The PHJEPRB must ensure that participant case files for males born January 1, 1960 and after contain proof of selective service registration. The PHJEPRB must also ensure that all male participants who are eligible to register for Selective Services are actually registered before services are rendered. A copy of the documentation must be provided with the CAP.

6. **Corrective Action** - ARRA 16-6 - Documentation of Selective Service Registration

- The selective service procedure has been updated reflecting documentation requirements and exclusion information related to the registration process.

OBSERVATIONS

- Documentation in some participant case files did not match the information entered in the State MIS. For example, participants were entered into the system as not receiving public assistance although documentation in the case file indicated that the participants received public assistance.

Suggestion: Case managers should ensure that documentation in the case file matches the information entered in the State MIS.

- The training occupation for a Dislocated Worker was entered in EFM as an Occupational Skills Training (OST) that was not on the Regional Targeted Occupational (RTO) list. Additionally, this training did not match the approved training that was on the RTO list recorded in the participant's hard (paper) copy case file.

Suggestion: Staff should ensure that the OST recorded and documented in both the participant's hard copy case file and the State MIS is accurate and represents the training being provided.

NOTABLE OBSERVATIONS

The PHJEPRB is commended on the following operational practices:

- The design of the WIA program/service tracking form that lists core, intensive and training services is of great benefit. The form lists the type of services provided to the participant, the date services were provided, and justification for providing the services as required by WIA. This procedure expedites the review process because all required data are assembled in one location in the case file.
- The following Customized Training agreements developed for company employees were notable:
 - (1) Spanish language training in writing, speaking, and listening skills was offered to health care workers to enable them to better communicate with Spanish-speaking clients and individuals.
 - (2) A local employed worker agreement that helped pilots update their Federal Aviation Administration (FAA) flying certification to meet necessary FAA standards to continue operating the Flying Intensive Care Unit.
- The youth incentive policy developed by PHJEPRB is well defined and documented in each participant's case file.

TRADE ADJUSTMENT ACT (TAA)

The sample size consisted of five participant case files.

The TAA program is designed to assist eligible trade-affected workers who have been laid off as a result of foreign competition with training or a waiver of the training requirement, income support, health coverage, tax credit, etc. Trade-affected individuals who qualify for training must be

permanently laid off, the employment separation date must be within the impact and expiration date of a certified petition, and they must meet the six program criteria.

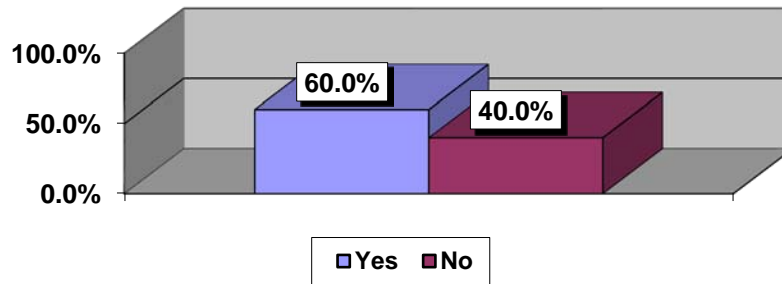
Finding TAA 16-7

TAA Deobligation Form Was Not Completed and filed with Unemployment Insurance

Applicable reference: 20 CFR 617.22, TAPR Reporting Requirements, AWI Operating Instructions.

State guidance requires that a TAA Deobligation Form be completed and submitted to the Unemployment Insurance (UI) Special Payment unit to be added to the participant’s UI history indicating that the customer had successfully completed or quit training in order to prevent overpayment of benefits. Of the five case files reviewed, two (40 percent) participants had completed or quit the assigned training; however, the TAA Deobligation forms had not been completed or submitted to the State’s UI Special Payment unit to be added to the participants UI claims history. The results are shown in Figure 7 - TAA.

Figure 7 - TAA: Was the TAA Deobligation Form Completed and filed with Unemployment Insurance in accordance with federal regulations?



Recommendation: The PHJEPRB must submit the required TAA Deobligation forms to the UI Special Payment Unit. AWI will verify that the training information has been entered in the participant case files. In the future, program staff should ensure that the required TAA Deobligation Form is submitted timely when a participant completes or quits training. Additionally, staff should carefully review the participant’s training start dates to ensure they are accurately entered in the State MIS.

Corrective Action - TAA 16-7 - TAA Deobligation Form Was Not Completed and filed with Unemployment Insurance

- The deobligation forms have been submitted, and internal processes reviewed to assure that case managers have an enhanced ‘real time’ view of TAA candidate’s status, including those who may quit training and / or move out of state. Typical case ‘follow up’ methods to be employed for obtaining current case status, and this action will preclude a recurrence of this item.

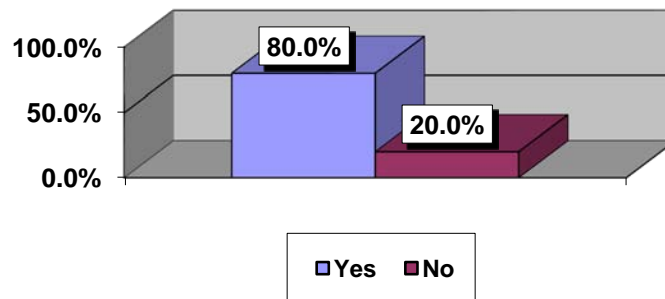
Finding TAA 16-8

Six Program Criteria in the TAA Module

Applicable reference: 20 CFR 617.22, TEGL 22-08.

Federal and State guidance requires that an application containing the six TAA program eligibility criteria be completed for all participants and entered in the TAA module in the State MIS. Five participant case files were reviewed in the State MIS to determine if this requirement was met. Four (80 percent) of the participant case files had the required documentation and one (20 percent) did not. The results are shown in Figure 8 – TAA.

Figure 8 - TAA: Were the six TAA program eligibility criteria entered in the TAA Module?



Recommendation: The PHJEPRB should enter all participant applications (including the six program eligibility criteria) in the TAA module in the State MIS before training is approved. It is necessary to enter TAA application and participation information in both the WIA and TAA programs in EFM for reporting purposes.

8. **Corrective Action** - TAA 16-8 - Six Program Criteria in the TAA Module

- A specific ‘six criteria’ eligibility form has been developed and implemented to assure compliance, as well as preclude a reoccurrence of this item.

OBSERVATIONS

- The training start dates for several TAA participants did not match the training start dates recorded in EFM under WIA.

Suggestion: Staff should ensure that training start dates are accurately recorded in the State MIS for the WIA and TAA programs. If a petition has been approved and the participant is enrolled in a partner program, the training start dates should be the same. This will ensure that the participant is eligible to receive TAA benefits based on the start of the first training activity assigned by a partner program.

- The review determined that a participant’s training paperwork had not been submitted to the Special Payment Unit for determination of extended TRA and Health Coverage Tax Credit benefits.

Suggestion: The PHJEPRB should ensure that the local TAA Coordinator is aware of the requirement to provide a copy of the training paperwork to the Special Payment Unit. Submitting appropriate documentation is required in order to ensure determinations for additional benefits are made and participants are exempt from looking for work while in an approved training program. Failure to submit such documents will preclude the eligible trade-affected worker from receiving maximum benefits.

- A few participant case files revealed that Request for Training Waivers were not recorded in the TAA Module. Waivers of training requirements are issued when an individual has not participated in training prior to the training deadline in order to protect the individual's receipt of benefits (e.g., income support and health coverage tax credit).

Suggestion: The PHJEPRB should ensure that the local TAA Coordinator is aware of the requirement to record waiver activities and entries into the TAA Module. This information is required to be entered for reporting purposes.

- One case file revealed that the participant quit training but the local TAA Coordinator failed to close the training activity.

Suggestion: The PHJEPRB is reminded to properly close the training activity when appropriate. Since the TAA program is time sensitive, any weeks that appear as though the individual is participating in training could lead to questionable costs should the TAA program pay for training that exceeds the number of weeks allowed.

- A couple of participant case files were missing several pieces of information (e.g., entitlement of benefits, case notes, initial determination information from the liable state, etc.).

Suggestion: The PHJEPRB should ensure that the local TAA Coordinator obtain appropriate information from the liable state when a trade-affected worker has relocated to another state. The agent state where the participant has relocated must ensure there is coordination in order to obtain initial determination and eligibility information including approval of training, when appropriate.

General Comment

In reviewing the participant case files and the issues noted above, it appears that the local TAA Coordinator may be in need of some training on TAA requirements, processes and procedures. A review of AWT's TAA Training Roster from the on-site training provided during the summer of PY 2009 did not reflect any staff attendance for this region. If TAA training or technical assistance is needed, it is suggested that PHJEPRB contact AWT's Office of Workforce Services, One-Stop and Program Support.

WAGNER-PEYSER

The sample size consisted of 66 participant case files (38 job seekers and 28 job orders).

The Wagner-Peyser (WP) review focused on compliance with the Wagner-Peyser Act, as amended, and federal guidelines that mandate the operation of the public labor exchange system. The review of the public labor exchange system included verification that the program was in compliance with veteran regulations, and that appropriate services were provided to the general public. The review concentrated on the application of the federal definition of a placement; job development; and the Equal Employment Opportunity (EEO) regulations regarding discrimination based on race, creed, sex, national origin, and age. Additionally, the Priority Re-employment Planning Program (PREP) was reviewed for adherence to State rules and program guidelines. ARRA WP and Reemployment Services related issues were also reviewed.

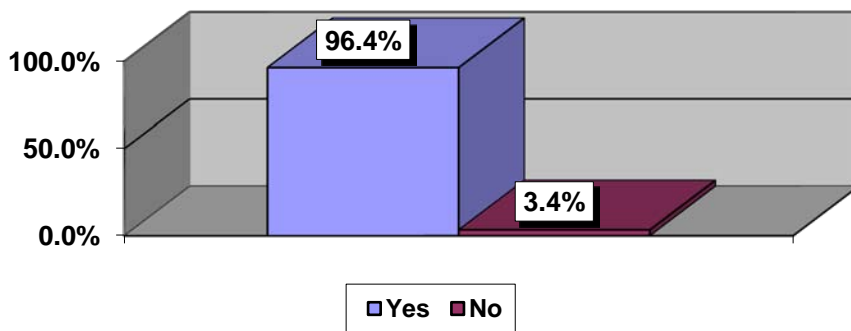
Finding WP 16-9

Equal Employment Opportunity (EEO)

Applicable reference: Title VII of the Civil Rights Act of 1964, Section 2000e-3 (Section 704); Age Discrimination in Employment Act; and Americans with Disabilities Act.

Job orders are to be written to conform to various laws which prohibit discrimination and/or terms which may be considered discriminatory in the posting of job advertisements. Of the 28 job orders reviewed for EEO compliance, 27 (96.4 percent) were in compliance with EEO regulations and one (3.4 percent) was not. The job order specified an age requirement due to insurance purposes which is not a valid reason to specify an age requirement. The results are shown in Figure 9 – WP.

Figure 9 - WP: Did the job orders comply with EEO laws and Regulations?



Recommendation: It is recommended that PHJEPRB ensure that staff reviews the “[Job Order](#)” training presentation on the AWI website. Staff should not specify an age on a job order unless it is required by law such as a person serving alcohol who must be over a certain age, or a specific program requirement such as an older worker or youth program in which the job seeker must meet an age requirement as specified by law. It is also recommended that staff review Federal and State child labor laws.

9. Corrective Action - WP 16-9 - Equal Employment Opportunity (EEO)

- Job Order staff has reviewed the AWI Job Order training presentation. Staff is very aware of the age specification when posting job orders. Job Order staff has reviewed Federal and State child labor laws and comply with age requirement as specified by law.

Finding WP 16-10

Veterans Priority of Service

Applicable reference: 20 CFR 652.120

A veteran who registered prior to the system generated Priority of Service (POS) code 089, and has subsequently come in for services, should be given the POS information and a code 189 entered in EFM by a staff person. Three veteran job seeker job orders were reviewed. None of the three veteran job seeker job orders reviewed that were served by staff had either a code 089 or a code 189 recorded to document that POS information was provided.

Recommendation: Staff must provide veterans with POS information and enter code 189 in the activities screen in EFM when services are provided by staff and the veteran has not previously been provided POS. Activity code 089 or 189 must be entered. It is suggested that staff review the EFM tip on POS located at:

http://www.floridajobs.org/pdg/ef/tips/AwiInfoTips_Efm_Atch_041709.pdf

10. Corrective Action - WP 16-10 - Veterans Priority of Service

- An internal training was performed post audit to discuss this item with staff, as well as review all services provided to veterans.
- Staff have been reminded to check for the POS 089 code when engaging a veteran 'in person', and to issue POS information & enter the 189 code when applicable.
- During internal monitoring of the WP program, the Quality Assurance Manager will select a separate sample of veteran cases to assure compliance to all veteran specific requirements.

Finding WP 16-11

Quality Referrals

Applicable reference - AWI FG 03-035 Wagner-Peyser (W-P) Job Seeker Registration and Employer Services Procedures.

Wagner-Peyser guidance requires that applicants be screened for suppressed job orders and that they are referred only if qualified for the job. There was one job order that had a staff referral where the job seeker did not meet the minimum qualifications for the job based on a review of the job seeker's qualifications identified on the job seeker's resume and application on the job order,

Recommendation: Prior to referring a job seeker to a job, the job order must be adequately pre-screened to ensure that the job seeker meets the minimum job qualifications as specified on the job order. NFWDB should remind program staff to not refer a job seeker to a job if the job seeker does not meet the minimum qualifications. Program staff should also be reminded to better align job seeker qualifications with job order requirements and to direct jobseekers to job opportunities based on their current work history, training, or skill level.

11. Corrective Action - WP 16-11 – Quality Referrals

- Staff have been counseled regarding exact matching of minimum employer requirements prior to performing a referral.

- Management is performing weekly sampling of staff referrals (utilizing a file review checklist) to verify proper performance of referrals, as well as other staff performance measures on each case.

SYSTEMIC ISSUES

- The federal definition of a job placement requires verification of the placement to include the start-to-work date and the source of placement verification. Of the 28 job orders reviewed with a placement, seven (25 percent) job orders had proper notes to verify the placement and 21 (75 percent) did not have a note to verify the start-to-work date or the placement verification source. Additionally, of the seven job orders that did have a note to verify the placement, five (71.4 percent) did not specify the source with whom the placement was verified.

Suggestion: Staff should always enter the verification source of the placements on the job order case notes screen or the notes screen when the placement is entered in EFM (i.e., the start-to-work date and the source with whom the placement was verified). It is suggested that each person who is tasked with entering job orders review the “Writing Job Orders” training presentation on the AWI website.

OBSERVATIONS

- Staff is allowing some job orders to expire without any documentation in the job order case notes of the follow-up with employers prior to the job order expiring.

Suggestion: Staff should not allow job orders to expire without any follow-up. The region is responsible for all job orders entered in EFM and should periodically follow-up on all job orders and document the follow-up in a job order case note.

NOTABLE OBSERVATIONS

- Staff is doing a good job reviewing employer registrations and enabling or revoking employer registrations in EFM prior to the registration being automatically approved by the system.
- Staff is also doing a good job working the “Referrals Pending Review” list on suppressed job orders.

PRIORITY REEMPLOYMENT PLANNING PROGRAM (PREP)

The PREP Program is a federally mandated program for claimants who are in their fourth week of a claim and have received their first payment. The program is intended to target those who are most likely to exhaust their claim. The program requires that the claimants receive an orientation to one-stop services and that an initial assessment be conducted to determine what additional services are necessary or required to help them re-enter employment.

There were no findings or systemic issues; however, the following observation was noted.

OBSERVATION

- The staff person conducting the PREP session in Spring Hill reviews the individual assessment form completed by the claimant after the claimant has left the one-stop center. The staff person then calls the claimant at a later date to schedule an appointment for an individual assessment if there appears to be a need for additional services. This requires the claimant to travel back to the one-stop for the assessment.

Suggestion: The region should consider allowing the Reemployment Services OPS staff working in the one-stop center to assist with the PREP individual assessments while the claimants are in the one-stop center. This would help reduce time and travel costs.

AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) FUNDS FOR WP AND REEMPLOYMENT SERVICES

The ARRA WP funding allows states to help job seekers in one-stop career centers secure employment and workforce information by providing a variety of services including job search assistance, skills assessment, and labor market information to job seekers and employers seeking qualified individuals to fill job openings. RES funding provides job search and other employment-related assistance services to UI claimants in order to accelerate their return to work. States are encouraged to integrate implementation of Dislocated Worker services with Reemployment Services and UI programs so that individuals have easy access to all programs regardless of their point of entry into the system.

OBSERVATIONS

- It was noted that the number of referrals to WIA for the month of October 2008 compared to the month of October 2009 increased by 3362 percent (increased from 42 referrals to 1580 referrals) which was the intent of the ARRA funding and TEG 14-08.
- The region had expended approximately \$100,580 which amounts to 53.04% of the WP ARRA funds through 12/29/09.
- The region is using the state tools to calculate the number of FTE jobs created and retained in the region. As of November 30, 2009 the region reported 57.60 FTE's created/retained with ARRA funds.

ONE-STOP CREDENTIALING

The One-Stop Credentialing review was conducted to determine compliance with program guidance. Specifically, the reviewer visited all three one-stop career centers in the region to ensure that required posters were openly displayed and specific links to federal and State program information was on resource room computers. Additionally, the reviewer tested whether all “front-line” staff was knowledgeable of one-stop programs and services, had completed required Tier I certification courses, as well as continuing education courses in related subjects.

The centers were very orderly and nicely arranged. The resource rooms seemed to be adequately staffed for the number of people who were using the computers. However, the following issue was noted.

Finding 16-12

Tier I Certifications and Continuing Education Hours

Applicable reference – One-Stop Credentialing Final Guidance AWI FG 02-032

The One-Stop Credentialing guidance states that “newly hired front-line staff must attain the Tier I Certification within six months of their hire date. For this purpose, front-line staff is defined as “any individual who works primarily with customers, either participants or employers.” The guidance does not distinguish between part-time and full-time employees and does not restrict the requirement to staff who only work with participants. These guidelines are the basis for the Tier I Certification, as well as the annually required 15 hours of continuing education. The region had nine OPS staff who had not completed the required Tier I Certification within the first six months of employment. All front-line staff who had been employed for more than one year had completed the 15 hours of continuing education.

Recommendation: It is essential that staff be knowledgeable of all facets of workforce services that are covered by the Tier I coursework. One-stop center managers must allow time for staff to complete the required Tier I Certification within the first six months of employment and the annually required 15 hours of continuing education. PHJEPRB must ensure that the individuals identified on the monitoring tool who have not completed their Tier I Certification receive the required training. A copy of the training certification documenting compliance or a timeline of when the training will be completed must be provided with the CAP. It is also recommended that PHJEPRB maintain a spreadsheet that identifies all front-line staff, their hire date, and the date they complete their Tier I Certification. The PHJEPRB should also track the number of hours of continuing education that front-line staff completes each year. The region will also need to maintain documentation on the Tier I Certifications and hours of continuing education completed by staff.

12. Corrective Action - WP 16-12 – Tier I Certifications and Continuing Education Hours

- An oversight regarding the Tier I applicability has been corrected, and all new staff (working with employers and / or participants) are being scheduled to complete the Tier I certification (regardless of PT or FT status).
- A database is being developed to facilitate enhanced tracking and reporting of Tier I scheduling and completion dates. The database design is also structured to include tracking and verification of annual continuing education unit (CEU) requirements.

MANAGEMENT INFORMATION SYSTEMS (MIS)

The MIS security check ensures that the region has a business process and policy in place that monitors and safeguards MIS user’s access and termination to and from the system. The business process and policy must ensure that the region has an up-to-date list of persons who are authorized to use the MIS, has a system in place to remove users that are no longer authorized to have access, and that the region maintains MIS security forms for all users.

The review revealed that the region has a policy in place to ensure that staff who are no longer employed in the Region are promptly removed from having access to the MIS. The region maintains an up-to-date listing of current users within the region. The region also maintains copies of MIS forms for all users in the region.

CONCLUSION

The results of the review of PHJEPRB's program management processes, operational practices, and service delivery systems indicate that PHJEPRB appeared "generally" to be in compliance with established federal and State laws, policies, and procedures. However, some deficiencies in operational, system practices, and case file documentation requirements were observed. For the noted deficiencies, the reviewers have provided recommendations and suggestions in an effort to help PHJEPRB and service providers develop and implement processes that result in positive program outcomes, as well as improve the quality and integrity of the data collected.