

***Workforce Investment Act Compliance Review
Program Year 2013***

Issued to:

West Piedmont Workforce Investment Board

July 15, 2014

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OVERVIEW

The West Piedmont Workforce Investment Area is a large geographic area that encompasses the cities of Danville and Martinsville and the counties of Henry, Patrick, and Pittsylvania. The West Piedmont Workforce Investment Board (WPWIB) maintains a consortium of partners as the One-Stop Operator for the adult and dislocated worker programs, which is led by Pittsylvania County Community Action (PCCA). Currently, there are two Comprehensive One-Stop Centers located within the workforce investment area, one in Martinsville and one in Danville. Two satellite centers also provide services in Chatham and Stuart. The role of the One-Stop Operator is currently contracted out to the lead WIA service provider in the Martinsville/Danville areas.

WIA Youth services are provided by three contractors chosen through competitive procurement. The three youth providers are the Pittsylvania County Community Action (PCCA), Henry County Public Schools, and Patrick County Public Schools.

Purpose of the Review

During the week of April 28th-May 2nd 2014, The Workforce Development Services (WDS) team of the Virginia Community College System (VCCS) conducted the required annual compliance review of LWIA #17, West Piedmont Workforce Investment Area, for Program Year 2013. The purpose of the review was to determine whether procedures are in place to ensure compliance with the Workforce Investment Act, and to identify areas in which technical assistance is needed to ensure continuous improvement.

As part of the review, the team covered three major areas: administrative, fiscal, and programmatic. Good practices are included to highlight activities the review team commends the local area for providing.

The following pages include detailed information on the findings in the three major areas from the annual compliance review. For each area, the report may include findings, concerns, and considerations. If the review team identified a finding or concern, then a detailed description and required action/recommendation is provided. For the purpose of this report the following describes the difference between findings that require action and concerns with recommendations.

- **Finding**: Findings indicate that the area is out of compliance with current federal laws/regulations or state and local policies. To ensure compliance, each finding has a required action. Local areas must provide a corrective action plan for all findings.
- **Concern**: Concerns identify a potential risk to the local area and may result in a future finding if the issue is not addressed. Although this does not indicate that the local area is out of compliance, recommendations are provided to improve services to the local area.
- **Consideration**: Considerations indicate an area identified that would be a benefit to the local area.

Summary of Review			
Area of Review	Findings	Concerns	Considerations
Administrative	X	X	
Fiscal	X		
Programmatic	X	X	

1. Good Practices

1.1 Leveraging Resources: West Piedmont Workforce Investment Board was awarded a Building Collaborative Communities grant to “Build Capacity for Entrepreneurship Development through Education and Public Awareness.” Activities the grant will fund include an entrepreneurial program for grades K-12 and adults, teacher training, business plan competition support, and other entrepreneurial activities.

2. ADMINISTRATIVE

2.1 Explanation of Area of Review

Local Areas are required to follow specific guidelines as stated in the Act relating to the administration and management of WIA funded programs. To verify this, the review team performed a review of the following areas:

- Workforce Investment Board;
- Youth Council;
- Policies and Procedures;
- Local Area Monitoring;
- Service Provider Contracts and RFPs;
- ADA Accessibility of Comprehensive Workforce Centers; and
- WIA Equal Opportunity Requirements

2.2 Findings

2.2.1 **Procurement**

The West Piedmont Workforce Investment Board did not maintain proper documentation to ensure that the procurement procedures were followed in selecting the PY 13 Adult/Dislocated Worker/Business Services and One-Stop Operator RFP that was issued on January 31st, 2013.

All recipients and sub-recipients must adhere to the procurement requirements as outlined in the *Uniform Administrative Requirements for Grants and Cooperative Agreements 29 CFR 97.36* and specifically **29**

CFR 97.36 (b)(9) which states that Grantees and sub-grantees must maintain records sufficient to detail the significant history of a procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

Required Action:

The local area must provide a timeline of the procurement activities and any related supporting documentation for the identified activity in this finding.

The local area must also develop a plan detailing how it will comply with procurement standards for all future procurements. These corrective actions must be provided to the VCCS by **7/30/2014**.

2.2.2 Local Area Monitoring

- Fiscal and sub-recipient contract monitoring is conducted, but not documented in writing or issued in a written report and provided to the contractors.
- Programmatic monitoring reports issued do outline corrective actions required from contractors, but the corrective actions are not followed up on to ensure that they are completed in a timely manner.

20 CFR 667.410 (c)(1) requires that each recipient and sub-recipient must continuously monitor grant-supported activities in accordance with the uniform administrative requirements at 29 CFR parts 95 and 97, as applicable, including the applicable cost principles indicated at 29 CFR 97.22(b) or 29 CFR 95.27, for all entities receiving WIA title I funds.

Virginia Workforce Letter 11-08- provides guidance to the local areas on the requirements for local level monitoring, oversight, and evaluation necessary to ensure compliance with the Workforce Investment Act of 1998, federal and state laws and regulations, OMB circulars and Department of Labor Employment Training Administration (DOL-ETA) guidance. This guidance also addresses required work papers, written compliance reports and corrective action plans.

Required Action:

The local area must provide the VCCS with a plan on how it will document the required fiscal and sub-recipient contract monitoring and follow up on corrective actions to ensure they are closed out within a reasonable timeframe after the issuance of the report.

A timeline for documenting the fiscal and contract monitoring completed for PY13 must also be submitted to the VCCS for approval.

Finally, the local area must review and revise its local area Monitoring Policy to include a more defined process for its fiscal and sub-recipient contract monitoring. The policy should also outline review documentation requirements, reporting timeline and requirements, and requirements for corrective actions.

Provide documentation of the above actions to the VCCS by **August 22, 2014**.

2.2.3 Equal Opportunity

The West Piedmont Workforce Investment Board website does not identify or provide the contact information of the local Equal Opportunity Officer. Additionally, it does not display the Equal Opportunity tagline language that is required.

29 CFR 37.26 (a) and (b) require that the local area Equal Opportunity Officer's name, position title, address and telephone number are made public and should appear on all internal and external communications and materials about the non-discrimination and equal opportunity programs, including the local area website. This section also requires that the local area include the Equal Opportunity taglines "equal opportunity employer/program" and "auxiliary aids and services are available upon request to individuals with disabilities".

Required Action:

The local area must ensure that their website is updated and prominently displays the name and contact information of the local EO Officer as well as the EO taglines. The local area must provide documentation showing that the WPWIB website has been updated to include this information to the VCCS by **8/22/2014**.

*Documentation provided during the comment period shows that the WPWIB has updated its website to reflect the name and contact information of the local area EO Officer and the required Equal Opportunity taglines. **No further action is required.**

2.3 Concerns

2.3.1 Youth Out-of-School Contract Administration

The VCCS review team is concerned over the management of the Youth programs administered by PCCA and the residual impact it may have on WPWIB and the WIA Program.

- A) Local area monitoring initiated in the late fall uncovered an unusually large amount of Out-of-School Youth participant files in Martinsville/Henry County with questionable eligibility, which led to a total of \$36,355.63 in disallowed costs.
- B) Overall, the contractor has had no new participant enrollments, and has expended very little on direct participant services since December of 2013.

The review team recognizes the efforts of WPWIB to mitigate the management and fiscal concerns it has with these youth contractors. This includes the following actions:

1. WPWIB created a new program assistant position to increase their capacity to provide more hands-on oversight of the youth programs.
2. WPWIB conducted an in-depth review of all Martinsville/Henry County Out-of-School youth participant files in November and December of 2013 and issued findings to the contractor in February. The WPWIB has been communicating with the contractor since then to obtain corrective actions
3. The WPWIB put out an RFP for PY2014 Youth Services, and has contracted with a new contractor to provide all youth services for the local area.

Required Action:

VCCS requires the following to ensure that proper processes and procedures related to the management of WIA funds and program are followed.

- The WPWIB must work with the Grant Recipient of the local area to develop a plan to recapture the disallowed costs and submit it the plan to the VCCS for approval no later than **June 30th, 2014**.
**The WPWIB submitted a plan to recapture the disallowed costs to the VCCS on 6/25/2014 and the plan was accepted by VCCS on 7/10/2014.*
- The WPWIB must update the VCCS on the status of PCCA's actions to resolve the findings in the local monitoring report until the disallowed costs are recaptured.
- Provide guidance and training to the new youth service provider.

2.3.2 Incentives Policy

The local area Incentives Policy does not provide a specific delineation of the items that are eligible and/or not eligible for incentives, the dollar amounts for specific items, and the documentation required to support the provision of an incentive.

During the review it was noted that several youth participants were provided with fast food gift cards as an incentive for participating in activities such as work experience and leadership development. Often it was documented that these cards were provided to cover the cost of the

participants' lunch related to the activity. This practice is not addressed in the Incentives Policy. Meals provided in relation to all-day activities should not be considered incentives.

Recommendation:

The local area should revise the local area Incentives Policy to include more specific delineation of the items that are eligible and/or not eligible for incentives, the dollar amounts for specific items, and the documentation required to support the provision of an incentive.

2.4 Considerations

No Administrative Considerations were identified

3. FISCAL

3.1 Explanation of Area of Review

Pittsylvania County continues to act as both the grant recipient and fiscal agent for LWIA #17. A review of the financial records and management was conducted to ensure the following:

- Expenditures have been made against the correct cost categories and within the cost limitations specified in the Act and the regulations;
- Internal controls are reasonable to ensure segregation of duties;
- Financial reporting and procurement policies are being followed and accurate;
- Payroll was accurately allocated and reported; and
- Inventory is reasonable within the specified guidelines expressed by VCCS.

3.2 Findings

3.2.1 **Expenditure Discrepancies**

A review of WIA expenditures revealed multiple expenditures that did not have sufficient supporting documentation. Two instances were identified where expenditures were improperly charged.

29 CFR 97.20 (6) requires that all recipient and sub-recipient accounting records be supported by adequate source documentation such as cancelled checks, paid bills, payrolls, time and attendance records, contracts and sub-grant award documents, etc.

Required Action:

There must be adequate descriptions and documentation of expenditures and reimbursement requests, in order to determine if an expense is an allowable, necessary and reasonable WIA cost. VCCS staff recommends that the WPWIB consider creating a standard checklist for reimbursement

requests, in order to ensure that the appropriate information needed for reimbursement is outlined. This will save staff time, clearly communicate what is needed and will assist new vendors in understanding what supporting documentation should be present when requesting reimbursements.

The WPWIB must work with the contractor's to obtain proper supporting for the expenditure issues identified above and provide that documentation to the VCCS by **7/30/2014**. The items identified in this finding have the potential to be questioned costs. If sufficient documentation cannot be obtained, the expenditures may be determined to be disallowed costs and must be repaid. The WPWIB must submit a plan outlining how it will obtain the necessary supporting documentation from the service providers to support the expenditures identified in this report; and how it will ensure that fiscal supporting documentation is complete for future expenditures.

3.2.2 Inventory

A review of the current inventory listing shows that it does not contain all pertinent information relating to equipment. The inventory listing does not include purchase dates, purchase amounts for new items, name of title holder, percentage or amount of federal (WIA) dollars used for the purchase, date of disposal, and sale price/method of disposal.

Additionally previous inventory reviews showed two vehicles (purchased in 2007) that do not appear in the current inventory listing.

29 CFR 97.34 (f) (i-ix) and the VCCS VWL 10-04: Equipment Management Procedures both *outline the required reporting categories relating to purchase and use of equipment.*

Required Action:

It is noted that the WPWIB has provided documentation to show that the second vehicle is titled to the Grant Recipient, per requirements.

The local area must bring their inventory list current and provide a plan outlining how they will comply with procurement procedures and ensure that they maintain a complete inventory listing and related documentation in the future.

Provide documentation of the above actions to the VCCS by **August 26, 2014**.

3.2.3 A-133 Audit Issues

A review of the A-133 audit for Pittsylvania County, the Grant Recipient for the West Piedmont Workforce Investment Area, revealed that the final amounts entered into the Schedule of Expenditures of Federal Awards

does not reconcile with the amount of expenditures submitted to the VCCS.

- The WIA amounts recorded on the Schedule of Expenditures of Federal Awards (SEFA) in the Comprehensive Annual Financial Report (CAFR) for Pittsylvania County do not reconcile with the expenditure amounts reported to VCCS.

	<u>Pittsylvania County</u>	<u>VCCS</u>
Adult	\$1,212,831	\$1,159,040.97
DW	\$514,442	\$295,960.56
Youth	\$1,147,669	\$1,054,305.14

Section 184 of the Workforce Investment Act (WIA) and the OMB A-133 Circular, Subpart C §300 and §310 require that all recipients of Federal funds maintain adequate internal controls over Federal programs that provide reasonable assurance that Federal awards are managed in compliance with applicable laws and regulations.

Section 7 of the Workforce Investment Act Title I Grant Award Agreement dated July 2012, states “The LWIAGR shall procure an annual, organization-wide financial and compliance audit in accordance with the Single Audit Act of 1984 and Office of Management and Budget (hereinafter referred to as OMB) Circular A-133. All funds covered by this agreement and received by the LWIAGR on behalf of the LWIA shall be included in the scope of the LWIAGR’s Single Audit. Accordingly, all funds received must be reflected in the LWIAGR’s audit report whether or not the LWIAGR has appointed a fiscal agent to manage funds on behalf of the LWIA.”

Required Action:

The local area staff should work with Pittsylvania County to review the discrepancies between the figures reported and provide an explanation for the discrepancies in the corrective action plan submitted to the VCCS.

The local area staff should also work with Pittsylvania County to review the process for providing financial records to the auditor and document opportunities to strengthen the process.

Provide documentation of the above actions to the VCCS by **August 26, 2014**.

3.3 Concerns

No Fiscal Concerns identified.

3.4 Consideration

No Fiscal Considerations identified.

4. PROGRAMMATIC

4.1 Explanation of Area of Review

A review was conducted on Adult, DW and Youth participant files. A participant file review was completed for twenty participant files to ensure compliance with the regular provisions of WIA and other applicable laws and regulations and consistency with data entry to Virginia Workforce Connection (VaWC).

4.2 Findings

4.2.1 Participant Eligibility Determination

One participant file contained conflicting documentation relating to Dislocated Worker eligibility and was missing the unlikely to return to previous industry or occupation analysis.

(Refer to Attachment B: Explanation of Findings and Concerns, 4.2.1. Participant Eligibility Determination, for more specifics on required action related to this finding.)

Required Action:

In instances where inconsistency in documentation is eligibility related, the local workforce investment area is subject to the increased potential of questioned costs. Case managers must take care to adhere to local area policy or guidance on eligibility and adequately document all determinations.

WPWIB must indicate in the corrective action plan what measures will be taken to prevent these types of errors in the future. For the item identified in the report, documentation must be submitted to the VCCS to provide more clarity on the participant's eligibility no later than **August 26, 2014**.

4.2.2 Missing and Incomplete Documentation

Several participant files had missing and/or incomplete documentation and include the following:

- Work experience agreements were missing information, performance evaluations were incomplete or not placed in the file, and some files were missing time sheets and supporting fiscal documentation.

- Documentation to support the provision of leadership development and tutoring were insufficient or missing from youth files. (For example, individual sign in sheets were used that provided the date and coordinator of the activity; and in some cases the name of the activity. However these documents did not include descriptions of the activities that were provided and were only signed by the participants.)
- Fiscal support documentation, including those for mileage reimbursements and incentives were not consistently maintained in youth participant files.
- Employment verifications were not documented in a consistent manner in the participant files.

(Refer to Attachment B: Explanation of Findings and Concerns, 4.2.2. Missing and Incomplete Documentation, for more specifics on required action related to this finding.)

Required Action:

Ensuring that the participant files contain the necessary documents is essential towards maximum case management and positive performance outcomes. Case managers and management must take care to ensure that all program documentation requiring signatures and dates is properly signed and dated prior to eligibility determination and any dispensation of services. It is critical that eligibility documentation is dated so that the date of eligibility is evident.

The WPWIB must indicate in the corrective action plan how they can prevent the issues noted in this report from happening in the future. Service provider training is recommended and should address file documentation consistency. For the items identified in the report, documentation must be submitted to the VCCS to ensure that the items are properly addressed.

Provide documentation of the above actions to the VCCS by **August 26, 2014**.

4.2.3 **VaWC Discrepancies**

Multiple participant files revealed VaWC discrepancies and failure to appropriately align the VaWC client record with program delivery. The following discrepancies were noted in VaWC:

- Dislocation date and employer of dislocation entered into VaWC do not match the dislocation documentation in the file.
- Credential type and credential dates in VaWC that do not match credential documentation in the files.
- Missing VaWC service codes for services that are documented in the files.

- Some VaWC activity service code dates were not an exact match to the actual service date and as recorded in the participant file.
- Activities extending beyond the limitations noted VWL #11-02, WIA Service Code Definitions and Limitations. Service codes need to reflect the VWL limitations. If services are still being provided beyond activity time limits, the activity dates may be extended but should still reflect appropriate time limitations and be documented through VaWC case notes.
- Institutionalized Exclusion used without sufficient supporting documentation in the participant file.

Virginia Workforce Letter (VWL) #10-2, Common Measures, states “it is important that service providers are held accountable for aligning program delivery with program results, i.e. common measures. Data entry and tracking in VaWC related to participant’s services and reports must be timely, relevant, accurate and consistent. Entering participant data in VaWC is critical to ensure that performance is reported accurately.”

VWL #11-02, WIA Service Code Definitions and Limitations

(Refer to Attachment B: Explanation of Findings and Concerns, 4.2.3 VaWC Discrepancies, for more specifics on required action related to this finding.)

Required Action:

The local area must review the application of VWL #11-02, WIA Service Code Definitions and Limitations with service provider management and case managers to ensure that service codes are appropriately entered into the system and accurately reflect participant activities and services received.

The WPWIB must review the participant cases identified in this report and provide a timeline for making the appropriate corrections to the active cases in VaWC. The local area must also indicate in the corrective action plan how they can prevent the issues noted in this report from happening in the future.

Provide documentation of the above actions to the VCCS by **August 26, 2014**.

4.2.4 Participant Contact and Documentation of Case Notes

Examples of case note issues noted during the participant file review were:

- Participant contact and notes did not always reflect timely contact with participants.
- Notes did not provide sufficient information to follow participant activities and progress.

- Case notes in some files were not entered in a timely manner and others reflected multiple contacts entered on the same date.
- Case notes were not used to extend activities per the requirements of VWL 11-02.

(See Attachment B: Explanation of Findings and Concerns for specifics on these findings.)

Required Action:

Keeping well documented case notes is an essential part of case management. This demonstrates that participants are receiving adequate contact and assistance in order to successfully achieving their goals. In addition, it provides a written record of services and work with an individual should the case manager change or if the individual returns to the program at another time.

The WPWIB should review expectations regarding case notes with all case managers. As part of the CAP, the local area should provide the VCCS with plan for how and when these expectations will be conveyed.

Provide documentation of the above actions to the VCCS by **August 26, 2014**.

4.3 Concerns

4.3.1 **Youth Individual Service Strategy goals**

Six participant files reviewed demonstrated Individual Service Strategy (ISS) goals and objectives that did not always align with the participant's needs or the services they actually received. In some cases, the goal was read more like an objective assessment of the client's situation and not a description of the client's goals and steps for achieving those goals. *(See Attachment B: Explanation of Findings and Concerns for specifics on these findings.)*

The ISS should serve to document participants' needs and goals, as well as the services provided to help them to attain their goals and become more employable. For those participants who have been identified as basic skills deficient, the Individual Service Strategies should include a goal and outline specific activities to help them improve those skills.

Recommendation:

Case managers should clearly identify goals and related activities in the IEP/ISS and align them with activities and services to improve outcomes for the individual.

The WPWIB must provide additional guidance and training to case managers on expectations in the development and implementation of participant goals and ensure that the Individual Service Strategies

address all of a participant's needs and activities during their time with the program.

4.4 Consideration

No Programmatic Considerations identified

5. Next Steps

5.1 Development of a Corrective Action Plan

Upon receipt of this report, the LWIA has 30 days to develop a corrective action plan to address the areas identified as noncompliant. A copy of the plan signed by the LWIA Executive Director must be provided to VCCS for approval. The appendix included in this report provides a sample format that the LWIA may wish to use in developing the plan.

5.2 Follow-up

Once the plan is approved, the LWIA should provide quarterly reports on the status of the plan until all of the actions identified are complete per the timelines specified in the approved plan. Supporting documentation is required to demonstrate completion of the actions.

Attachment A: Sample Corrective Action Plan

The corrective action plan must be submitted within 30 days of receipt of the findings report provided by VCCS. The plan must be signed and dated by the local area Executive Director.

Required Actions	Corrective Action	Expected Completion Date
Administrative		
2.2.1 Procurement		
2.2.2 Local Area Monitoring		
2.2.3 Equal Opportunity		
Fiscal		
3.2.1 Expenditure Discrepancies		
3.2.2 Inventory		
3.2.3 A-133 Audit Issues		
Programmatic		
4.2.1 Participant Eligibility Determination		
4.2.2 Missing and/or Incomplete Documentation		
4.2.3 VaWC Discrepancies		
4.2.4 Participant Contact and Documentation of Case Notes		

Concerns	Corrective Action	Expected Completion Date
Administrative		
2.3.1 Youth Contract Administration		
Fiscal		
No Fiscal Concerns Identified		
Programmatic		
4.3.1 Youth Individual Service Strategy		
4.3.2 Fiscal Documentation: Participant Files		

Name of LWIA Executive Director (print): _____

Signature of LWIA Executive Director: _____

Date: _____

Attachment B: Explanation of Findings and Concerns

Finding 3.2.1 Expenditure Discrepancies	
	Issue
WPWIB	\$91.52 -Wages for a temporary fill-in for the One-Stop center receptionist were only supported by an invoice (no timesheet was provided).
	\$4,093.07 -One provider reimbursement included salaries, office supplies and electricity, but the only supporting documentation provided was for the salary expenses.
	\$1,366.63 –Youth-in-school work experience wages were not supported with any documentation.
	\$17,576.10 – Salary expenses for Career Academy instructors were not supported with any documentation like timesheets, participant sign-in sheets, etc.
	\$209.12 –Amounts in the youth-in-school supportive services documentation does not match the amount paid. The documentation gives the amount as \$174.16.
	\$837.62 –was charged to youth-out-of-school client travel, but the supporting documentation provided was for staff travel to WIA Fall Practitioner’s Conference.
	\$176.38 –was charged to dislocated worker funds only, but the EO 55 disability workshop documentation shows multiple agency participants.

Finding 4.2.1 Participant Eligibility Determination			
State ID	Type of File	Status of File	Issue
1728356	DW	Active	The VaWC application indicates that the client was laid off from the Caps Shoe Company on 3/13/14. Documents in file include a letter from Times Fiber Communications with a layoff date of 10/1/13 and an impact list with date of 9/26/13, which clearly conflicts with the information in VaWC. The file is also missing the unlikely to return documentation.

Finding 4.2.2 Missing and/or Incomplete Documentation			
State ID	Type of File	Status of File	Issue
516860	Adult	Exited	A Performance evaluation for the work experience was not completed or placed in file.
1748060	Adult	Closed	Performance evaluation for the work experience was not completed or placed in file. Employment at closure was entered using information from a customer survey and not the Employment Verification form that

			is to be completed by the employers.
1559990	Adult	Exited	Performance evaluation for the work experience was not completed or placed in file. Employment at closure was entered using information from a customer survey and not the Employment Verification form that is to be completed by the employers.
616517	Adult	Closed	Employment at closure was entered using information from a customer survey and not the Employment Verification form that is to be completed by the employers.
1061717	DW	Exited	Work Experience agreement for 1st internship does not list out work activities. NO performance evals found in file for either work experience.
1548928	ISY	Exited	There is an April 2013 calendar of leadership development activities, but no flyers or sign in sheets to give more information about the activities. (Dates of LD activities in VaWC do not match dates of activities indicated on calendars).
961176	ISY	Exited	"Sign in sheets" for leadership development were in file giving date, name of activity and the customer signature (only one customer signature and no staff signature). No additional information was provided about the activities. No flyers or other docs present. Work experience agreement does not have proper information and only one timesheet was in file. No documents to support tutoring
1609844	ISY	Exited	No documentation to support leadership development.
1616214	ISY	Active	No documents in file to support provision of LD services other than a sign off sheet - no description of activities.
961176	ISY	Exited	The work site agreement does not contain a statement of work describing the skills to be learned. It does not list max number of hours for work experience or number of hours per week. Only one timesheet was found in the file, but it was a partial timesheet and was not for the whole time period indicated on the check. The duration was 5/29/12-6/30/12 @ pay rate \$7.25/hr. One check indicated time frame as 7/2-7/7/12 and one check was dated 8/3/12.
1548928	ISY	Exited	Employment verification during follow-up was completed on a telephone verification document instead of the Employment Verification Form.
113448	OSY	Active	Support docs for leadership development and tutoring are individual sign in sheets with date and name of the activity coordinator but no description of the activity. Only the participant has signed the document. More information on these activities must be provided. Sign-in sheets should include coordinator signature as well. One invoice for \$82.00 from JC Evans a Behavioral Health clinician for out of school group education. Documentation must be provided to describe this activity.
961588	OSY	Exited	NO performance evals were found in the file. File is missing support docs for mileage and timesheets for work experience for Check of \$648.50 dated 5/24/13.

Finding 4.2.3 VaWC Discrepancies			
State ID	Type of File	Status of File	Issue
1748060	Adult	Closed	JS&P- opened past time limitations and extensions were not documented with case notes. Missing 239- CRC activity.
616517	Adult	Closed	OST 300 not extended with case notes per VWL. An AAS credential entered in to system is incorrect. Docs in file show Career Studies certificate was actually received. The date of credential entered into the system is incorrect and needs to be changed.
1559990	Adult	Exited	Missing 239- CRC activity. JS&P was not extended with case notes per VWL11-02.
1061717	DW	Exited	Missing 239- CRC activity.
1728356	DW	Active	App in VaWC indicates client was laid off from Caps Shoe Company on 3/13/14. Docs in file include a letter from Times Fiber Communications with a layoff date of 10/1/13 and an impact list with date of 9/26/13. This information must be corrected in VaWC.
1013296	DW	Active	Missing 239- CRC activity.
303125	DW	Exited	notes not used to extend JS&P
1548928	ISY	Exited	The date of TABE assessment entered into VaWC does not match the date on the test located in the folder. Family size entered into VaWC does not match documentation in the participant file. DSS SNAP verification and Court custody docs indicate at least a family of 2.
961176	ISY	Exited	The date of TABE assessment entered into VaWC does not match the date on the test located in the folder. No supportive service incentive codes used for multiple incentives provided.
1609844	ISY	Exited	The date of TABE entered into VaWC does not match the date on the test located in the folder. 429 service code not extended with case notes per the VWL 11-02. Last activity and closure not completed until 9/27/13- more than a month later after case notes indicate that the client has left the area and will not return.
1616214	ISY	Active	Docs in file indicate client participated in pre-employment and training and received incentives- corresponding activities were not entered into VaWC. 429- Enrolled in HS (obsolete) is still open in VaWC. Need to close out since obsolete code.
1620535	OSY	Exited	Date of TABE entered into VaWC does not match the date on the test documentation in the file. GED activity closed in November, four months after last contact with client. Exclusion used based on case note dated 11/8 which states staff discovered client had been incarcerated on 9/9/13 but was out on bond a few days later. Other notes indicated that Pitts Co

			Police confirmed to staff over phone that they have a warrant out for his arrest. - at the time case was closed with exclusion the client was not incarcerated and no attempts had been made to check back on that status and document incarceration.
961588	OSY	Exited	Date of TABE entered into VaWC does not match the date on the test documentation in the file. Basic skills training activity was closed the same day as the gain posted on the test. 434 activity code not extended with case notes per VWL 11-02. Missing Work experience activity code in VaWC and missing supportive service activity code in VaWC for mileage and multiple incentives provided to client.

Finding 4.2.4 Case Notes			
State ID	Type of File	Status of File	Issue
1748060	Adult	Closed	Case note for 1/2/13 created 1/2/14 regarding training approval looks to be incorrect date. 153- JS&P initially opened past time limitation per VWL 11-02. Subsequent extensions were not documented with a case note per VWL 11-02.
616517	Adult	Closed	Several notes created outside the timely data entry rule. OST activity was not extended with case notes per VWL 11-02.
1559990	Adult	Exit	JS&P was not extended with case notes per VWL 11-02.
1013296	DW	Active	Case note dated 3/28 was created 4/29, outside of the timely data entry requirement.
1548928	ISY	Exited	Note dated 8/15/13 for a contact date of 7/17/13, which is outside of the timely data entry requirement. 12: notes dated 11/27/12 and 11/29/12 for 11/26/13 provide conflicting information with regard to participant attendance of leadership development activity.
961176	ISY	Exited	notes for 9/12 and 10/9 created on 11/27/12- Notes for 3/18, 3/19, 3/20, and 3/23 created on 4/4/13; noted for 5/25 created on 7/29; note for 8/29 created on 9/26- outside of timely data entry. Missing participant contact and case note for June 2013. Case notes are not very descriptive of some activities - need more description of leadership development activities and progress on work exp.
1609844	ISY	Exited	Notes for 7/24 and 8/2 created on 9/27/13- outside the timely data entry. Missing participant contact for April 2013. Notes indicate that student will be provided tutoring, leadership development, guidance and counseling, and mentoring, but there is no indication the client was offered tutoring help. Many notes describe leadership development activities that are not documented elsewhere in the file. Notes were not used to extend 429 activity codes.
1616214	ISY	Active	notes not used to extend services
113448	OSY	Active	Notes are more process oriented and do not provide much detail regarding the leadership development, pre-employment and

			training and tutoring. Tutoring activity was not extended with a case note per VWL 11-02.
1795216	OSY	Active	Notes do not discuss why customer is in Tutoring, as she is not BSD or in Occupational skills training yet.
1620535	OSY	Exited	Case note for 4/10 created 5/1; multiple notes from 5/30 on created well after the timely data entry rule. Activity 4/18 extended without use of case notes.

Concern 4.3.1 ISS			
State ID	Type of File	Status of File	Issue
1548928	ISY	Exited	The ISS only goal is to make "c's" on report card. No goals or objectives with regard to leadership development or to raise basic skills levels. The plan should be the outline for services to be provided.
961176	ISY	Exited	ISS does not reference the fact that the client is BSD in reading and should increase her basic skill levels. Goals are to pass the 11th grade and pass the 12 grade. Client provided leader ship development, work experience, and tutoring- but these are not addressed in the plan.
1609844	ISY	Exited	The one goal is to maintain a passing grade in history. The ISS does not reference or address BSD. No goals mentioned with regard to leadership development activities that were offered.
1616214	ISY	Active	The only goal is to get a passing grade in math. Plan does not address basic skills deficiencies, leadership development, etc.
1620535	OSY	Exited	Only goal is to get GED, Plan did not address Basic Skills Deficiency.