



**Finance/Performance Committee Meeting
Teleconference
Tuesday, January 31, 2023
8:00 a.m.**

Team Meeting Call In Info:

[Click here to join the meeting](#)

Or call in (audio only)

[+1 786-600-3104](#)

Phone Conference ID: 847 662 515#

AGENDA

- | | |
|--|------------------|
| 1. Welcome & Introductions | Lisa Eding |
| 2. Approval of Finance & Performance Committee Meeting Minutes from 11-07-2022 | Lisa Eding |
| 3. Review of Budget to Expenditure Report PY 22-23 as of 12-31-22 | Robin Dawson |
| 4. Summary of Non-Federal Funds as of 12-31-22 | Robin Dawson |
| 5. Unrestricted Funds Reserve and Policy | Robin Dawson |
| 6. Performance Update | Anthony Gagliano |
| a. Dashboard - CareerSource Suncoast | |
| 7. Internal Monitoring Update | Anthony Gagliano |
| a. CSS Internal Monitoring Report | |
| 8. Schedule Next Meeting Date and Time: TBD | Lisa Eding |
| 9. Final Comments and Adjournment | Lisa Eding |



Finance/Performance Committee Meeting Minutes

Virtual TEAMS Meeting
Monday, November 07, 2022
1:00 p.m.

I. Call to Order

Lisa Eding, Chair called the meeting to order at 1:02 p.m.

Attendees: Lisa Eding, Jim Bos, and CareerSource Suncoast (CSS) staff - Robin Dawson, Joshua Matlock, Anthony Gagliano, Kathy Bouchard, and Christina Witt.

II. Approval of August 29, 2022 Finance & Performance Committee Meeting Minutes

Lisa Eding asked for a motion to approve the August 29, 2022 meeting minutes.

Motion: Lisa Eding

Second: Lisa Eding

Motion passed

Jim Bos- abstained due to not attending the August 29, 2022 meeting.

III. Acceptance of Financial Audit Program Year Ending June 30, 2022

Ben Clark, Manager of James Moore & Company presented the financial audit report for program year ending June 30, 2022.

Lisa Eding asked for a motion to accept the financial audit report for year ending June 30, 2022 as presented.

Motion: Jim Bos

Second: Lisa Eding

Motion passed

IV. Budget to Expenditure Review

Robin Dawson, VP/CFAO, reviewed the following reports.

1. Review of Budget to Expenditure Report as of 9-30-22

a) Overall burn rate of 25%

b) YTD Federal and State requirements:

- Admin: 9.45%; max allowed 10%
- ITAs: 42.01%; minimum requirement 30%
- Youth Paid Internships/Work Experience: PY21@ 26.34%; minimum requirement 20%

- Youth Out of School: PY21 @ 97.63%; minimum requirement 20%
- 2. Budget to Expenditure Report by Fundsource as of 9-30-2022
- 3. Summary of Non-Federal Funds as of 9-30-22

V. Budget Modification Approval

Robin Dawson, VP/CFAO, presented the Budget Modification #2 PY 22-23

- Mod #1 Funding Available: \$6,937,279
- Increase in Funding: \$2,386,177
- Adjusted Funding Available: \$9,323,456
- Less Reserve for PY 23-24: \$ 717,570
- Mod #2 Funding Budgeted: \$8,605,886

Funding Budgeted for PY 22-23 Mod #2 was an increase of \$ 2,102,644 over Mod #1. Line items requested for an increase for PY 22-23 Budget:

- Add \$381,824 salary and fringe benefits
- Add \$18,898 accounting and audit
- Add \$1,500 general insurance
- Add \$5,000 travel and meetings
- Add \$1,690,422 client training and support
- Add \$5,000 outreach

Lisa Eding asked for a motion to approve Budget Modification #2 for PY 22-23.

Motion: Jim Bos Second: Lisa Eding
Motion passed

VI. Performance Update

Anthony Gagliano reviewed the CSS performance dashboard posted on the CSS Website at [Dashboard - CareerSource Suncoast](#) . The performance dashboard is broken down by quarters for the fiscal year. The dashboard provides information on services provided to career Seekers and employers.

The REACH act letter grades were released from CareerSource Florida in October, 2022 and are located on their website at [Analytics: Letter Grades: Grades \(careersourceflorida.com\)](#). The Dashboard displays the letter grades for the regions, with CSS currently having a C+ grade. The scorecard metrics for the letter grades were reviewed, focusing on the major areas of improvement needed to include, but not limited to: WIOA performance metrics, repeat business, and participants in work related training.

VII. General Updates

Additional WIOA funding may be received from DEO, a budget was sent to DEO requesting an additional \$560,000 in funding.

VIII. Final Comments and Adjournment – Lisa Eding, Chair

No final comments. Meeting adjourned at 2:05 pm.

CareerSource Suncoast
Expenditure To Budget Report - Summary
Program Year July 1, 2022 thru June 30, 2023
As Of 12/31/2022 (with accruals)

MOD 2

	PY TOTAL BUDGET	RESTRICTED EXPENSES YTD	BUDGET BALANCE	% OF BUDGET EXPENDED	UNRESTRICTED EXPENSES YTD	NOTES
PERSONNEL COSTS						
SALARIESFRINGE BENEFITS	\$4,273,195	\$1,921,935	\$2,351,260	45%	\$17	
STAFF TRAINING & EDU	\$35,000	\$30,931	\$4,069	88%		
TOTAL PERSONNEL COSTS	\$4,308,195	\$1,952,866	\$2,355,329	45%	\$17	
FACILITY COSTS	\$952,213	\$560,046	\$392,167	59%	\$0	
OFFICE FURNITURE & EQUIP	\$45,000	(\$24,886)	\$69,886	-55%	\$0	Refund from Ian insurance claim-North Port Goodwill location of \$31,458, Refund offsets expenses to date
OPERATING COSTS:						
ACCOUNTING/AUDIT	\$82,871	\$41,319	\$41,552	50%	\$2,856	Auditor and 990 fees paid for 22-23 engagement
CONSULTANTS/LEGAL	\$40,000	\$17,500	\$22,500	44%	\$0	OSO Oblig bal \$17,500
GENERAL INSURANCE	\$59,124	\$59,164	(\$40)	100%	\$0	Policies begin July 1
OFFICE EXP & SUPP	\$40,000	\$15,510	\$24,490	39%	\$6,566	
TRAVEL & MEETINGS	\$65,000	\$30,462	\$34,538	47%	\$5,437	
TOTAL OPERATING COSTS	\$286,995	\$163,955	\$123,040	57%	\$14,859	
PROGRAM SERVICES:						
CLIENT TRAINING/SUPPORT	\$2,812,482	\$510,256	\$2,302,226	18%		Obligations \$562,025 / Exp + Oblig 38%. IAN funds are available until 9/30/24 - current budget in this PY \$1,454,820
CLIENT & EMPLOYER SERVICES	\$102,000	\$88,643	\$13,357	87%	\$7,027	Client & ER subscription services renewed first of program year
OUTREACH	\$99,000	\$28,050	\$70,950	28%	\$3,916	EDCs & LCANs oblig bal \$59,520
TOTAL PROGRAM SERVICES	\$3,013,482	\$626,950	\$2,386,532	21%	\$10,942	
TOTALS	\$8,605,885	\$3,278,930	\$5,326,955	38%	\$25,818	Rates below as of 12/31/22: Admin 9.9 % Max 10% ITA 40.3%. Min Req 30% Paid Internships Exp: PY21 - 25.1%, Min Req 20% Out of Sch Exp: PY21 - 98.3%, Min Req 75%. Yth
Expected burn rate as of 12/31/22				50%		
Actual burn rate as of 12/31/22				38%	\$702,332	Unrestricted Fund Balance as of 12/31/2022 (MM & CD \$337,384 included in total balance)



**Budget to Expenditure Report
By Fundsource
PY 22-23
7/1/2022 - 12/31/2022**

Revenue:	Annual Budget Mod #2	TANF	WIOA Adult	WIOA Dis Wkr	WIOA Youth	WIOA Rap Resp	WIOA CDL Trng	NEG COVID	NEG Opioid Foster Rec	NEG Hurr Ian	Wag Pey	Wag Pey App Nav	Others
Carry Forward Funds from PY 21-22	\$1,914,196	\$193,814	\$0	\$111,717	\$604,445	\$12,461	\$0	\$362,895	\$470,820	\$0	\$158,044	\$0	\$0
Allocation Awards PY 22-23	\$7,409,260	\$1,319,933	\$929,003	\$963,959	\$747,202	\$75,144	\$200,000	\$0	\$0	\$2,000,000	\$586,675	\$62,500	\$524,844
Total Available Funding	\$9,323,456	\$1,513,747	\$929,003	\$1,075,676	\$1,351,647	\$87,605	\$200,000	\$362,895	\$470,820	\$2,000,000	\$744,719	\$62,500	\$524,844
LESS: Planned Carry Forward (Reserve) for PY 23-24	\$717,570	\$0	\$0	\$227,909	\$0	\$0	\$0	\$0	\$206,128	\$250,000	\$33,533	\$0	\$0
Total Revenue Budgeted PY 22-23	\$8,605,886	\$1,513,747	\$929,003	\$847,767	\$1,351,647	\$87,605	\$200,000	\$362,895	\$264,692	\$1,750,000	\$711,186	\$62,500	\$524,844

Budgeted Expenditures:		Expenditures To Date:												Total Expenditures	% of Budget	Indirect Pool
Salaries & Benefits	\$4,273,198	\$518,368	\$456,711	\$135,117	\$347,859	\$42,284	\$929	\$43,340	\$43,427	\$39,263	\$150,367	\$22,315	\$121,957	\$1,921,935	45.0%	\$0
Staff Training & Education	\$35,000	\$7,876	\$6,465	\$3,177	\$5,008	\$15	\$0	\$52	\$383	\$0	\$4,673	\$0	\$3,280	\$30,931	88.4%	\$0
Facility Costs	\$952,213	\$131,426	\$60,398	\$63,658	\$85,282	\$1,306	\$27	\$514	\$380	\$65	\$152,506	\$42	\$64,445	\$560,046	58.8%	\$0
Furniture & Equipment	\$45,000	-\$7,109	-\$6,087	-\$3,769	-\$5,322	\$0	\$0	\$0	\$0	\$0	-\$4,176	\$0	\$1,576	-\$24,886	-55.3%	\$0
Operating Costs	\$286,995	\$42,676	\$35,258	\$12,137	\$21,012	\$1,472	\$163	\$2,488	\$2,604	\$1,965	\$22,322	\$1,073	\$20,785	\$163,955	57.1%	\$0
Program Services	\$3,013,480	\$69,892	\$207,666	\$29,060	\$75,709	\$0	\$41,801	\$100,858	\$58,148	\$8,437	\$29,740	\$0	\$5,639	\$626,950	20.8%	\$0
Total Expenditures	\$8,605,886	\$763,129	\$760,411	\$239,381	\$529,548	\$45,077	\$42,920	\$147,251	\$104,942	\$49,731	\$355,430	\$23,430	\$217,682	\$3,278,930	38.1%	\$0

Remaining Available Funds	\$750,618	\$168,592	\$608,387	\$822,099	\$42,528	\$157,080	\$215,644	\$159,750	\$1,700,269	\$355,756	\$39,070	\$307,162	\$5,326,956
% of Funds Expended by Grant	50.4%	81.9%	28.2%	39.2%	51.5%	21.5%	40.6%	39.6%	2.8%	50.0%	37.5%	41.5%	38.1%

Federal & State Requirements as of 12/31/22:	Actual %	Ad/DW exp	56%
ITA % - 30% Min Expenditure Rate	40.3%		
Youth Out of Sch Expend Rate-Min 75%	98.3%		
Youth Paid WE/Internships Expend Rate-Min 20%	25.1%		
Administrative Cost %-Max 10%	9.9%		
NFA -DW Funding Used for Adult Activities	\$0		
Indirect Cost Recovery via Cost Allocation Method	100.0%		

CareerSource Suncoast
 Summary of Non-Federal Funds
 as of 12/31/2022 (with accruals)

	Business Support - 707	Tobacco Free - 719	Consolidated Workforce ED - 720	Consolidated Background Checks - 722	Ticket to Work - 724	MC Job Readiness - 726	Misc Client Supp - 730	Totals
Wells Fargo Unrestricted Funds								
Fund Balance as of 7/1/2022	\$39,677	\$9,020	\$124,361	\$9,744	\$159,101	\$0	\$1,515	\$343,417.57
Revenue								
Current Year	\$100	\$0	\$21,775 *	\$0	\$24,336	\$0	\$0	
Bank Interest Income	\$0	\$1,138	\$0	\$0	\$0	\$0	\$0	
	\$100	\$1,138	\$21,775	\$0	\$24,336	\$0	\$0	\$47,349
Expenditures - Current Year	\$6	\$7,174	\$9,994	\$0	\$8,645	\$0	\$0	\$25,818
Increase/(Decrease) in Cash - Current Year	\$94	(\$6,036)	\$11,781	\$0	\$15,691	\$0	\$0	\$21,530 surplus/(deficit)
Wells Fargo Cash Balance as of 12/31/2022	\$39,771	\$2,984	\$136,142	\$9,744	\$174,792	\$0	\$1,515	\$364,948

Recorded as Program Income
 Expensed as Program Income

15,000
 (15,000)
 0

Truist Bank - MM Unrestricted Funds	SWB Misc - 901
Fund Balance as of 7/1/2022	\$162,741
Revenue	
Current Year	\$0
Bank Interest Income	\$6
	\$6
Expenditures-Current year	\$0
Increase/(Decrease) in Cash - Current Year	\$6
Truist Cash Balance as of 12/31/2022	\$162,747

Edwards Jones - CD	
CD Account (increments \$1k)	\$174,000
Savings Account	\$302
	\$174,302
Revenue	
Current Year	\$0
Bank Interest Income	\$334
	\$334
Expenditures-Current year	\$0
Increase/(Decrease) in Cash - Current Year	\$334
Edward Jones Balance as of 12/31/2022	\$174,637
	\$337,384

Total Unrestricted Funds as of 12/31/2022 \$702,332



POLICY# 20-23

Policy: Revenue Diversification and Non-Federal Funds	Page 1 of 3
Program: Workforce Innovation and Opportunity Act (WIOA)	
Section: Operations	
Date of Issuance:	Revision Date:
Distribution: CareerSource Suncoast (CSS) Team Members and Board of Directors	

Background

The Workforce Innovation and Opportunity Act allows local workforce development boards to customize employer-related services to provide on a fee-for service basis. In accordance with the Code of Federal Regulations (CFR) [20 CFR 678.440](#). A fee may be charged for services provided under [20 CFR 678.435\(b\)](#) and [20 CFR 678.435\(c\)](#). Services provided under [20 CFR 678.435\(c\)](#) may be provided through effective business intermediaries working in conjunction with the Local Workforce Development Board (LWDB) and may also be provided on a fee-for-service basis or through the leveraging of economic development, philanthropic, and other public and private resources in a manner determined appropriate by the LWDB. The LWDB may examine the services provided compared with the assets and resources available within the local one-stop delivery system and through its partners to determine an appropriate cost structure for services, if any. Any fees earned are recognized as program income and must be expended by the partner in accordance with the partner program's authorizing statute, implementing regulations, and Federal cost principles identified in Uniform Guidance.

The program income generated from fee-for- service activities must be used in accordance with the WIOA guidelines.

DEO has determined Social Security Administration's Ticket to Work Program and FL Department of Health – Tobacco Free Funds are examples of Federal & State incentives deemed as unrestricted funds. These funds will be accounted for separately as unrestricted revenue in the accounting system. Funds received from local community-based organizations will be considered unrestricted funds. Based on the CSS indirect rate methodology each fundsource will absorb their fair share of indirect costs based on the cost allocation method.

Purpose

To provide guidance on revenue diversification for fee-based services for program income and the generation and management of non-federal funding sources.

Policy

Program income is the gross income received that is directly generated by a grant-supported activity, earned only as a result of the grant agreement during the grant period, or given a service agreement on a fee for service basis.

Revenue generation is important to diversifying and increasing system resources. A critical element in the development of a fee for service program is to identify those services that are provided at no charge and to identify additional services that can be provided on a fee for service basis.

Fee-based services allow CSS to respond to service gaps in the local community when federal dollars are insufficient to meet the demand for services beyond basic services offered to employers. The primary motivation of developing a fee for service program is to:

- Offer specialized services,
- Serve more customers, and
- Enhance service levels in the face of declining federal dollars.

Revenue Diversification Guidelines:

In order to maintain the integrity of the workforce system, the following guidelines on revenue diversification must be followed:

1. Basic and Individualized Career services must be maintained and provided at no cost to the public at all times.
2. Fee-based services will be clearly identified as to how they differ from those provided at no cost to the business customer.
3. The fee for services can be packaged into a proposal meeting customer needs. Fee for service examples might include:
 - Customized screening and referral of qualified participants in training services to employers;
 - Customized services to employers, employer associations, or other such organizations, on employment-related issues;
 - Customized recruitment events and related services for employers including targeted job fairs;
 - Human resource consultation services, including but not limited to assistance with:
 - Writing/reviewing job descriptions and employee handbooks;
 - Developing performance evaluation and personnel policies;
 - Creating orientation sessions for new workers;
 - Honing job interview techniques for efficiency and compliance;
 - Analyzing employee turnover;
 - Creating job accommodations and using assistive technologies; or
 - Explaining labor and employment laws to help employers comply with discrimination, wage/hour, and safety/health regulations;
 - Customized labor market information for specific employers, sectors, industries or clusters; and
 - Other similar customized services
4. The employer agreement will define which fee-based services will be offered with consideration for the aforementioned examples.
5. Conflict of interest shall be avoided, and the program income rules will be adhered to for tracking revenue, expenses, and reporting accordingly.

Non-Federal Funds:

CareerSource Suncoast may generate non-federal income through participation in State or Federal incentive initiatives, private grants, fundraising, etc. The non-federal funds generated are not reported as program income. Examples of generating non-federal funds include but are not limited to:

- Ticket-To-Work Program Participation
- Tobacco-Free Florida Program Participation
- Application and Receipt of Private Grants
- Event Sponsorship

Non-federal funds generated may be used for but not limited to CSS operations, employee engagement, client support services, client program expansion, facility costs, and expenses not allowable with Federal funds.

Non-Federal Funds Budget Allocation

Each year CSS completes and submits an annual operating budget to the CSS Board of Directors and the Manatee and Sarasota County Board of Commissioners for approval. The annual operation budget is based on the Notice of Funding Awards (NFAs) received by the Florida Department of Economic Opportunity (DEO). Beginning Fiscal Year 2023/2024, CSS will include a non-federal funds line-item budget for planned expenditures each fiscal year.

Attachments:

- None

Authority:

- CareerSource Suncoast Administration
- [20 Code of Federal Regulation 678.440](#)
- [20 Code of Federal Regulation 678.435\(b\)](#)
- [20 Code of Federal Regulation 678.435\(c\)](#)

Supersession:

This Policy supersedes and replaces CSS Policy #14-02 Revenue Diversification, dated 08/21/2014.

Inquiries:

Any questions about this policy should be directed to the CEO, COO, CFAO and/or their designee.

LWDB 18

Measures	PY2021-2022 4th Quarter Performance	PY2021-2022 % of Performance Goal Met For Q4	PY2021-2022 Performance Goals	PY2022-2023 1st Quarter Performance	PY2022-2023 % of Performance Goal Met For Q1	PY2022-2023 Performance Goals
Adults:						
Employed 2nd Qtr After Exit	90.00	94.74	95.00	88	97.13	90.60
Median Wage 2nd Quarter After Exit	\$12,636	127.64	\$9,900	\$ 11,996	128.29	\$9,351
Employed 4th Qtr After Exit	90.30	95.05	95.00	91.7	105.40	87.00
Credential Attainment Rate	71.40	85.00	84.00	84.5	108.33	78.00
Measurable Skill Gains	71.10	129.27	55.00	76	103.54	73.40
Dislocated Workers:						
Employed 2nd Qtr After Exit	71.60	75.37	95.00	71.7	92.40	77.60
Median Wage 2nd Quarter After Exit	\$9,615	114.46	\$8,400	\$ 9,692	96.17	\$10,078
Employed 4th Qtr After Exit	85.70	95.22	90.00	100	149.25	67.00
Credential Attainment Rate	18.80	26.86	70.00	25	42.81	58.40
Measurable Skill Gains	80.60	164.49	49.00	76.9	108.16	71.10
Youth:						
Employed 2nd Qtr After Exit	62.50	69.44	90.00	57.5	69.28	83.00
Median Wage 2nd Quarter After Exit	\$7,625	125.00	\$6,100	\$ 7,065.00	159.48	\$4,430
Employed 4th Qtr After Exit	75.00	78.95	95.00	75	108.70	69.00
Credential Attainment Rate	77.80	101.70	76.50	87.5	108.43	80.70
Measurable Skill Gains	66.70	121.27	55.00	61.9	91.03	68.00
Wagner Peyser:						
Employed 2nd Qtr After Exit	62.50	83.33	75.00	64.50	99.23	65.00
Median Wage 2nd Quarter After Exit	\$6,930	126.00	\$5,500	\$7,079	118.97	\$5,950
Employed 4th Qtr After Exit	62.60	86.94	72.00	64.50	101.57	63.50

Not Met (less than 90% of negotiated)
Met (90-100% of negotiated)
Exceeded (greater than 100% of negotiated)



- PY
- 20-21
 - 21-22
 - 22-23
 - Q1
 - Q2
 - Q3

Career Seekers Services

2,982

Number of Services

All

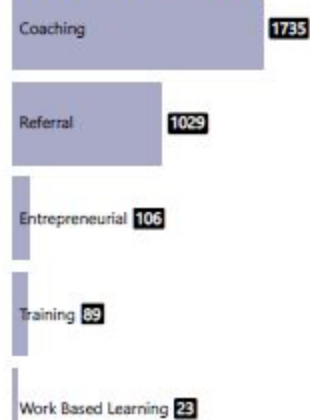
Employers Services

1,375

Number of Services

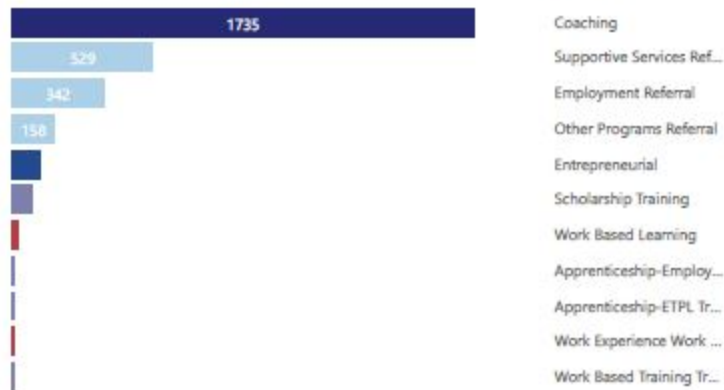
All

Number of Services by Category



Number of Services by Category and Subcategory

Category ● Coaching ● Referral ● Entrepreneurial ● Training ● Work Based Learning



Number of Services and Unique Number of Employers by Category



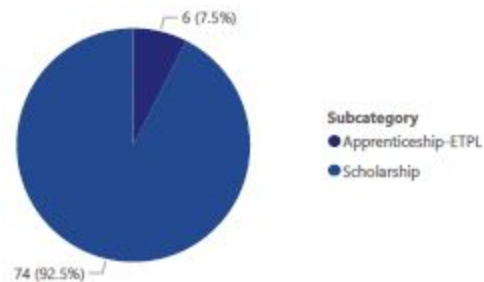
Number of Services and Unique Number of Employers by Service Description



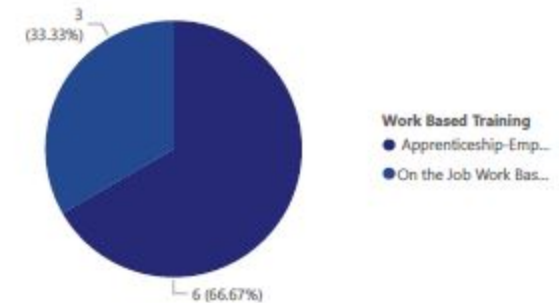
Career Seekers Occupational Skill Training

Career Seekers Work Based Training

Providers	Active Training
State College Of Florida, Manatee-Sarasota-Cs	27
Galen College Of Nursing-Is	14
Suncoast Technical College-Vs	10
Fleet Force	9
Manatee Technical College-Vs	9
Tampa Area Electrical JATC	4
	2
Suncoast Trucking Academy, Inc.	2
Computer Coach Training Center - vs	1
New Horizons Computer Learning Center - Tampa	1
University of Alabama	1
Total	80



Providers	Active Training
Tampa Area Electrical JATC	3
	2
New Dawn Electric	2
Technical Education Council LLC	1
VitaCare Home Care, LLC dba Home Helpers and Direct Link of	1
Total	9



CareerSource Suncoast
October 2022 Quality Assurance Internal Monitoring Report
WIOA Program - Adult, Dislocated Worker and Special Projects

This report includes the results of the October 2022 CareerSource Suncoast internal monitoring of the Workforce Innovation and Opportunity Act (WIOA) Program administered by CareerSource Suncoast including files for Adult, Dislocated Worker and Special Projects.

Enter corrective action plan (CAP) responses for all Findings and Other Noncompliance Issues (ONI) where indicated in blue (**Response**) in the October 2022 - CSS Internal Monitoring Response document on the Programs Portal in folder Monitoring Response Document – October 2022. A link to the document is provided below. Observations identified in this report are informative statements or constructive comments to improve the delivery of services and to help ensure continued fiscal integrity of the LWDB. Observations are not expected to be responded to in the CAP, but it is recommended that they are reviewed and taken into consideration for further discussion.

If training is or will be provided, include the date of the training or the scheduled date for the training in the response. Once scheduled training has been completed, an agenda and sign-in sheet for each training must be submitted. If corrections are made in EF or a missing or corrected document placed in a participant's file, supporting documentation of corrected and/or filed documentation (copy of document, screenshots, etc.) must be submitted. Place supporting documentation in the October 2022 Internal Monitoring Supporting Documentation folder on the Programs Portal. A link to the folder is provided below.

Notify the CSS Q.A. Coordinator by email at dlee@careersourcesc.com once all responses are completed and documentation submitted as identified above.

This review included a total of twenty-three (23) files as follows: WIOA Adult & DW – fifteen (15); WIOA Special Projects – eight (8).

The following are links to the October 2022 Monitoring Response Document and Supporting Documentation folders:

Programs Portal – Monitoring – CSS Internal Monitoring – October 2022

Monitoring Response Document – October 2022: [Monitoring Response Document - October 2022](#)

Supporting Documentation – October 2022: [Supporting Documentation - October 2022](#)

Monitoring Tool – October 2022: [Monitoring Tool - October 2022](#)

October 2022 Monitoring Samples: [October 2022 Monitoring Samples](#)

WIOA ADULT & DISLOCATED WORKER

FINDINGS - 14

Finding - Q2 – Sample #1 - Income Verification Documentation/Data Validation: Paystubs in client's file for income verification do not match the entries on the Income Calculation Worksheet. Documentation includes duplicate pay stubs for 5/14/21, 5/28/21, 6/11/21 & 6/25/21 and the pay stub for the 11/04/21 entry on the worksheet is not included in the income verification paystubs.

Response:

While there are duplicate paystubs in the file, they are not duplicated on the income calculation sheet. There is a note made by the staff member at the bottom of the income

calculation sheet stating, "Calculations for the missing check 11/4/21 were made by using the difference between the year to date on the check for 10/28 and 11/10." (See supporting documentation.) The duplicate pay stubs were removed from client file. It was identified that staff could benefit from training on completing the Income Calculation Form and calculating missing pay stubs. Training on this will be completed by 1/13/23.

Finding - Q2 – Sample #5 - Income Verification Documentation/Data Validation: The calculated average weekly income in client's income calculation worksheet is not accurate based on 2021 & 2022 number of weeks worked and/or weekly pay periods. The "Explanation of How Family Annualized Income was Determined for Client" document states client worked 28 weeks in 2021 and 8 weeks in 2022. Client actually worked 31 weeks in 2021 (weeks 05/30/21 - 06/05/21 through 12/26/21 - 01/01/22) with 30 pay periods (06/10/21 - 12/30/21). Earnings for week 31, 12/26/21 - 01/01/22 are included in pay date 01/06/22. Client worked 8 full weeks in 2022 but the gross earnings for pay stub 03/03/202 include 9 weekly pay periods (01/06/2022 - 03/03/2022).

Response:

While the staff's explanation of the calculation was incorrect, documentation was in the case file to support the low-income determination. The explanation for the calculation was re-done and is now corrected. (See Supporting Documentation) EF was updated using the new calculation and the application was corrected, scanned to file, and old one removed. It was identified that staff could benefit from training on completing the Income Calculation Form and calculating missing pay stubs. Training on this will be completed by 1/13/23.

Finding – Q2 - Sample #4 - Income Verification Documentation/Data Validation: The WIOA Adult Income Calculation Worksheet 2 identifies **\$280.67** gross income for pay date **11/10/2021**. Supporting documentation/pay stub for pay date **11/10/2021** is not in client's file.

Response:

The staff member used the pay stubs prior to and after the 11/10/2021 pay date to calculate the gross income, however, did not explain this on the income calculation form. The application has been updated to show the explanation. (See Supporting Documentation) It was identified that staff could benefit from training on completing the Income Calculation Form and calculating missing pay stubs. Training on this will be completed by 1/13/23.

Finding – Q3 - Sample #7 - WIOA Program Income Eligibility: All sources of income prior to WIOA eligibility is not included in WIOA Income Eligibility Calculation. Client's EF Employment History identifies two jobs with start dates prior to WIOA eligibility date, both identifying "Still Employed" (05/2018 - Present - Surrey Place of Bradenton and 05/2020 - Present - Family First Homecare). Income from only one job (Family First Homecare) is included in the income eligibility calculation and EF case notes do not explain the absence of income verification for the second job.

Response:

Emailed Sean and Sam to have Jennifer reach out to client to find out when last day of employment at Surrey Place. (my notes, not a response)

Finding - Q6 – Sample #2 – Authorization to Work in the U.S./Data Validation: Food Stamp Record is identified for Authorization to Work on client's Document Verification Form and in EF WIOA Application U.S. Citizenship status (Demographic Information screen). Although copies of the FLORIDA System AIID and IQFS screens are in client's file, neither of the documents include

information to verify Citizenship/Authorization to Work. Minimum WIOA eligibility requirements include proof of age, authorization to work in the U.S. and Selective Service verification.

Response:

The DVF was updated to reflect Documentation specified on the I-9 form as well as the supporting documentation in the application. (See Supporting Documentation) EF was updated, and the application was corrected, scanned to file, and old one removed.

Finding – Q17 - Sample #2 - Determination of Need for Training: Determination of Need for Training was not in client's file at the time of the review.

Response:

The Determination of Need for Training is in the client file, Doc ID: 333672 filed on 9/17/2020 (See Supporting Documentation). Document was not appropriately labeled by the Data Specialist; however, this has been corrected. We are requesting to have this finding removed.

Finding - Q78 – Sample #2 - Credential Documentation: The Manatee Technical College Practical Nursing Certificate of Completion identified in EF for credential attainment verification does not meet the requirements of a credential.

Response:

Client did not have a license in the file for a credential. License verification was located, and this issue has been corrected. (See Supporting Documentation) Staff training on this issue was conducted on 10/14/2022.

Finding - Q78 – Sample #3 - Credential Attainment: The document in client's file (Practical Nursing Certificate of Completion) labeled Credential does not meet the requirements of a credential.

Response:

Client did not have a license in the file for a credential. License verification was located, and this issue has been corrected. (See Supporting Documentation) Staff training on this issue was conducted on 10/14/2022.

Finding - Q78 – Sample #6 - Credential Documentation: The 160 Hour Class A Commercial Truck Operator Program Certificate of Completion in client's file labeled Credential" does not meet the requirements for a credential.

Response:

Client did not have a license in the file to support the credential. Responsible staff member was notified and is working with the client and program provider to obtain the CDL License. Staff training on this issue was conducted on 10/14/2022.

Finding - Q78 – Sample #7 - Credential Documentation: The Unofficial Transcript in client's file does not meet the requirements for a credential.

Response:

Client did not have a license in the file for a credential. License verification was located, and this issue has been corrected. (See Supporting Documentation) Staff training on this issue was conducted on 10/14/2022.

Finding - Q78 – Sample #10 - Credential Attainment: The document in client's file labeled Credential – AS Degree does not meet the requirement of a credential for this client. Documentation submitted is client's AS Degree for Dental Hygiene. Staff should check Dental Hygienist License search on the Florida Department of Health License Verification Search Portal for license.

Response:

License verification for a Dental hygienist was located and uploaded to client file. (See Supporting Documentation) Staff training on this issue was conducted on 10/14/2022.

Finding - Q78 – Sample #13 - Credential Attainment: The document in client's file labeled Credential does not meet the requirement of a credential. Based on information from State College of Florida's site, the online Medical Billing and Coding course prepares students for CPC (Certified Professional Coder), CCA (Certified Coding Associate) or CBCS (Certified Billing & Coding Specialist) certification or credential exam.

Response:

Client only completed training to take the certification test which is the document recorded. Staff member was notified to continue to contact client to obtain a credential as client has about 7 months remaining in follow-up. Staff training on this issue was conducted on 10/14/2022.

Finding - Q78 – Sample #15 - Credential Attainment: Verification is not in client's file to support the credential entered in EF for attainment date 02/16/2022.

Response:

This client was enrolled in Customized Training which does not require a credential, yet the staff member entered the certificate of completion (MSG) as a credential. We cannot correct this issue as the client does not have a credential and we cannot delete from EF. Staff training on this issue was conducted on 10/14/2022.

Finding - Q88 - Sample #12 - Follow-Up Services: Documentation verifying staff offered Follow-Up Services at case closure/exit is not in client's case file or EF case notes.

Response:

The responsible staff member is out of office until 12/19/22. Upon their return, management will work with the staff member to resolve this issue.

OTHER NONCOMPLAINE ISSUES (ONI) - 11

ONI - Q75 - Sample #1 - Measurable Skill Gains: Documentation of a Measurable Skill Gain is not in client's case file.

Response:

Documentation of an MSG is in client file (Doc ID: 354731, filed on 4/21/2022) however, staff did not identify it was an MSG when scanning to the queue. (See Supporting

Documentation). Document has been relabeled to include MSG. Staff training on this issue was provided on 10/14/2022. We are requesting to have this ONI removed.

ONI - Q76 – Sample #2 - Measurable Skill Gains:

MSG 1 - Attainment Date 04/07/2021 - Client was not enrolled in WIOA training on the MSG attainment date 04/07/2021. Client began WIOA Occupational Skills Training at Galen College on 08/31/2020 and the training ended with Unsuccessful Completion on 09/30/2020 prior to attainment date 04/07/2021. Client began Occupational Skills Training at Manatee Technical Institute on 06/14/2021 after the MSG 04/07/2021 attainment date.

MSG 2 - Attainment Date 12/07/2021 – Client’s file does not include documentation verifying at least 12 credit hours in one semester for the Post-Secondary Transcript/Report Card MSG, attainment date 12/07/2021.

Response:

MSG 1 – Attainment Date 04/07/2021 – We cannot correct this issue as deletion of MSG’s in EF is prohibited. Training on this issue was conducted on 10/14/2022.

MSG 2 – Attainment Date 12/07/2021 – Staff entered the incorrect Skill Type. The correct Skill Type should have been Skills Progression – satisfactory progress in obtaining technical or occupational skills as evidenced by trade related benchmarks such as knowledge-based exams. This has been corrected (See Supporting Documentation)

ONI - Q76 - Sample #4 - Measurable Skill Gains: The documentation in client's case file labeled "MSG - GRADES" does not include completion/achievement date 07/21/2022 to match information entered in EF. The document print date 07/05/2022 is prior to the MSG Date Achieved (07/21/2022) entered in EF. In addition, the filed document is not valid for MSG type Skills Progression. MSG Resource Guide page 8, Skills Progression states, " Note: Passing a test in an academic course by participants enrolled in a traditional secondary or postsecondary education program is not considered a gain for this MSG type".

Response:

Emailed Shona on 12/2/22 regarding this issue. As of 12/7/22, no response. Sent a follow up email to Shona on 12/7/22.

ONI - Q76 - Sample #7 - Measurable Skill Gains: Documentation in client’s file for MSG attainment dates 12/17/2021 an 03/22/2022 do not meet the requirements for MSG type Post-Secondary Transcript/Report Card. MSG entered for 12/17/2021 date achieved identifies Transcript as verifying documentation. Documentation in client's file labeled "MSG TRANSCRIPT" does not identify 12 credit hours earned for 2021 Winter term 09/30/2021 - 12/17/2021. In addition, this document does not identify 12 credit hours earned for MSG attainment date 03/22/2022 for 2022 Spring term 01/03/2022 - 03/22/2022.

Response:

We cannot correct this issue as it happened in last PY. Training on this issue was conducted on 10/14/2022.

ONI - Q76 - Sample # 11 - Measurable Skill Gains: Documentation in client's file for MSG 1 does not include a date to match the attainment/achievement date entered in EF.

Response:

Supporting documentation was uploaded to client file showing the date of the attainment/achievement and they match what is in EF. (See Supporting Documentation) Training on this issue was conducted on 10/14/2022.

ONI - Q76 – Sample #14 - MSG Documentation: The documents submitted for MSG Skill Type Post-Secondary Transcript/Report Card attainment dates 05/07/2021 and 01/18/2022 do not meet the requirements for Post-Secondary Transcript/Report Card. Client did not complete at least 12 credit hours in one semester as required for full-time student. EF Case notes and MSG records state Client is a part-time student. Client was enrolled in training as a full-time student as identified on the SCF Degree Pathway-A.S. Business Administration, Management 2 Year Plan document attached to the 09/04/2020 ITA Purchase Order in client's file.

Response:

Client received a Certificate in Business Operations and Business Specialist on 5/7/21. The MSG for 5/7/21 was changed to Skills Progression – Other skills progression achievement. Client received a Certificate in Business Management on 12/10/21. The MSG dated 1/18/22 was changed to 12/10/21 with Skills Progression – Other skills progression achievement. The case note was also updated to remove “client is a part-time student”. (See Supporting Documentation). Training on this issue was conducted on 10/14/2022.

ONI - Q87 – Sample #10 - EF Employment At Exit - Employment Record Occupation Code: EF employment at exit record identifies Occupation Code for Dental Assistants (31909100). Client's Job Title on EVF and in EF is Dental Hygienist. Please review and update with appropriate code.

Response:

Client's Occupation Code has been updated in EF to reflect Dental Hygienist. (See Supporting Documentation)

ONI - Q91 – Sample #9 - Quarterly Follow-Up after Exit: 1st and 2nd quarter follow-ups after exit were not completed by the due date indicated in the follow-up table in EF.

Response:

Offices were closed from 9/27/22 – 10/3/22 due to Hurricane Ian. Staff entered a case note stating the reason why the follow up was not completed by the due date of 9/30/22. (See Supporting Documentation)

ONI - Q92 - Sample #2 - Quarterly Follow-Ups: 2nd and 3rd quarter follow-up employer address included on EVF but not entered in the employment follow-up record.

Response:

Employer address in the employment section in the WIOA Application is not a required field in EF. All required information is entered. DEO WIOA Monitoring tool PY 2022-23 states the location of the data can be in the State MIS or Electronic Case File Supporting Documentation. The completed EVF is in the Case File. We are requesting to have this ONI Removed.

ONI - Q92 - Sample #10 - Quarterly Follow-up Verification: Documentation to support 1st and 2nd quarter follow-up employment is not in client's file.

Response:

Emailed Patrick for correction on 12/2/22. Patrick is working with the client to get the missing paystubs. (my notes, not a response)

ONI – Q92 – Sample #12 - Quarterly Follow-Up Documentation: Documentation for 1st quarter after exit follow-up is not in client's file to verify the employment information entered in EF.

Response:

The responsible staff member is out of office until 12/19/22. Upon their return, management will work with the staff member to resolve this issue.

OBSERVATIONS - 4

OSERVATION - Sample #1 - SS# Verification Documentation: Applicant Statement is identified for SS# verification on CSS Document Verification Form in client's file. Although client self-attested to SS# on filed Applicant Statement, a copy of FLORIDA System's IQEL screen in client's file is labeled "For Proof of Social Security Number". Valid documentation should be used for verification when available in lieu of self-attestation. Reviewer suggests updating the Document Verification form to identify " Letter from Social Service Agency" in addition to Applicant Statement for SSN Verification documentation.

Response:

The application and supporting documentation was updated to reflect the IQEL as.

OBSERVATIONS – Q5 - Sample #3 – WIOA Program Eligibility - Age at registration and Q6 - Authorization to Work in the U.S: The Birth Certificates in client's file labeled "Date of Birth Verification and Authorization to Work / U.S. Citizenship Verification contains City only (City of Elizabeth) and no state, province, country, etc... Reviewer verified client's age at registration and Authorization to Work/U.S. Citizenship status with information on filed document labeled "Family Size Verification 3 of 4" (child's birth certificate) under Mother's/Parent's Information. Please review and update filed documentation as needed.

OBSERVATION - Sample #5 - Measurable Skill Gains Case Note (Create Date 06/06/2022): The 06/06/2022 EF case note subject for MSG 1 states the MSG was achieved 6/3/22. The attainment date as identified in the body of the case note and in supporting documentation is 05/27/2022. Reviewer suggest correcting case note subject to avoid confusion.

OBSERVATION - Q87 – Sample #7 - Employment at Exit: EF employment record entered at Program Closure/Exit identifies "Yes" for question "Is this considered a Training Related Employment". Client's WIOA training was for Registered Nursing. Client's employment at exit is LPN with same job title and employer as employment at WIOA enrollment with increase in hourly wage but not related to recent RN training.

WIOA SPECIAL PROJECTS

FINDINGS - 3

Finding - Q88 – Sample #1 - 08/02/2022 Credential Attainment: The Occupational Skills Certificate or Credential in client's file for 08/02/2022 Date Received does not meet the requirement of a credential.

Response:

Cannot correct this issue as we cannot delete the credential. Staff did record the license verification as a credential on 9/1/2022. Training on this issue was conducted on 10/14/2022.

Finding - Q88 - Sample #2 - Credential Attainment: The FleetForce Class A Commercial Truck Operator Program Certificate in client's file and in the EF credential attainment record is not an industry recognized credential. In addition, the document is not labeled Credential in the file.

Response:

Client did not have a license in the file to support the credential. Staff was notified and is working with the client and program provider to obtain the CDL License. Staff training on this issue was conducted on 10/14/2022.

Finding - Q6 - Sample #6 - Documentation of U.S. Citizenship/Authorization to work in the U.S: Client's SS# was verified at enrollment with a copy of 2021 W-2 form. "Documentation specified on the I-9 form" is identified on client's CSS Document Verification Form Verification for verification of Authorization to Work/U.S. Citizenship Verification which requires one document from List B and List C of I-9 acceptable documents if a document from list A is not available. A document from the I-9 List C for acceptable documents is not in client's file.

Response:

DVF and EF were updated to show Public Assistance as supporting documentation for Auth. To Work. Unemployment Records are used as Public Assistance Supporting Documentation and was updated in the application as well. (See Supporting Documentation)

OTHER NONCOMPLIANCE ISSUES (ONI) – 4

ONI - Q86 - Sample #1 - 08/02/2022 MSG: Documentation in client's file for Secondary Transcript/Report Card MSG, achievement date 08/02/2022, does not meet the requirement for the MSG type. The document does not include at least 12 credit hours in one semester during the program year.

Response:

MSG was updated in EF to show Skills Progression. Training on this issue was conducted on 10/14/22.

ONI – Q102 – Sample #5 - 1st and 2nd Quarter Follow-up Employment Verification: Employment information recorded in EF for 1st Quarter Follow-up does not include the employer address entered on the Employment Verification documentation in client's file. EF follow-up records identify client worked in 2nd quarter. Documentation for 2nd quarter follow-up employment is not in client's file at the time of this file review.

Response:

Employer address in the employment section in the WIOA Application is not a required field in EF. All required information is entered. DEO WIOA Monitoring tool PY 2022-23 states the

location of the data can be in the State MIS or Electronic Case File Supporting Documentation. The completed EVF is in the Case File. For the 2nd quarter follow up, supporting documentation was filed on 11.22.22 at 3:20pm, which was after this review. (See Supporting Documentation)

ONI - Q89 - Sample #6 - Credential Attainment: The EF Credential Information does not include credential verification to match the document in client's file.

Response:
WIOA Credential Verification (License Verification) was entered in EF. (See Supporting Documentation) Staff training on this issue was conducted on 10/14/22.

ONI - Q101 - Sample #6 - Quarterly Follow-Up After Exit: 1st Quarter After Exit follow-up was not completed by due date. Follow-up due 09/30/2022 was completed 10/10/2022.

Response:
Offices were closed from 9/27/22 – 10/3/22 due to Hurricane Ian. Staff entered a case note stating the reason why the follow up was not completed by the due date of 9/30/22. (See Supporting Documentation)

OBSERVATION - 1

OBSERVATION -Sample #5 - MSG Verifying Documentation: Client's file does not include a document labeled Measurable Skill Gains or MSG. Reviewer used the filed document labeled "CERTIFICATE OF COMPLETION - ISO INTERNAL AUDITOR TRAINING 05/31/2022" to verify MSG entered in EF.