



**Oklahoma Works Partners Conference**  
**April 14<sup>th</sup>, 2017**  
**Monitoring**

# Oklahoma Office of Workforce Development (OOWD)

Oklahoma State University-Oklahoma City (OSU-OKC) became the new Workforce Innovation and Opportunity Act (WIOA) Title 1 Grant Recipient Agency and the State WIOA Title 1 Administrative Agency in June 2015.

The Office of Workforce Solutions at the Oklahoma Department of Commerce transferred to OSU-OKC and was renamed the Oklahoma Office of Workforce Development (OOWD).

By shifting workforce to the Education Secretary's portfolio this new structure and leadership demonstrate Oklahoma's renewed commitment to align education with workforce development.

In Oklahoma, the Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, governs, manages, and accounts for the way the state issues Department of Labor WIOA funds.



# OOWD's Approach to Monitoring

Oklahoma's approach to Program and Fiscal monitoring of each local area utilizes a combination of on-site monitoring as prescribed in Section 183 of WIOA and, desktop monitoring.

The purpose of monitoring is to ensure that the local area boards and fiscal agents operate programs and provide integrated service delivery effectively and efficiently in compliance with all applicable laws, regulations, uniform administrative requirements, and State and local established policies.

With the implementation of a Virtual Case Management System, Oklahoma has established a more strategic role for monitoring. Both monitoring approaches allow for the continued collaboration between the Office of Workforce Development and the Local Areas.

Local area monitoring is broad and comprehensive and also verifies that the local area boards are in compliance with their own monitoring policies.



# WIOA Youth Program

## Notable changes:

- WIOA requires a minimum of 75% of State and Local youth funding to be expended on out-of-school youth vs. 30% under WIA.
- As of June 30, 2015, Youth Councils were no longer required. Local areas are encouraged to establish a standing Youth Committee to provide information to assist with planning related to the provision of youth services.
- The age for initial eligibility determination for out-of-school changed from 16-21 years of age to 16-24 years of age.
- 20% of local youth funds must be spent on work experience. The work experience component is not a new concept. However, what is new under WIOA is the requirement of a minimum expenditure. The Work Experience component applies to in-school youth & out-of-school youth.



# WIOA Youth Program, Cont.

- The state now has the authority to define the program eligibility barrier *Youth Who Require Additional Assistance*. A youth who requires additional assistance to complete an educational program or secure and hold employment is defined by the State as a low income youth meeting one of the following criteria:
  - Youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction;
  - Youth with a parent or legal guardian who lacks a high school diploma or GED;
  - Youth who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the State Department of Education website @ <http://sde.ok.gov/sde/priority-schools>.
  - A low income youth between 18-24 years of age with a pattern of Poor Work History. Poor Work History includes non recurring employment income and sporadic employment.



# Best Practices Observed while Monitoring the WIOA Youth Program

- Local areas are focused on placing all work experience participants in paid work experience which incentivizes the achievements of the youth and is more likely to keep the youth engaged in the program.
- Youth were noted as contacting the Oklahoma Works office to inquire about WIOA services after seeing outreach efforts for the WIOA Program on social media.
- Use of incentives to keep participants engaged in the program is resulting in successful outcomes.



# General Observations from Monitoring the WIOA Youth Program

- Local Areas should focus on capturing as many forms of alternate contact information upfront since the population of youth we serve frequently changes phone numbers and addresses. Contact through social media accounts prior to an extended gap in communication with a client is one of the messaging portals that we strongly encourage all local areas to implement or consistently practice.
- Avoid extensive gaps in case notes in the case management system by following local policy.
- Youth have been determined to not have been initially enrolled according to their program eligibility and barriers.



# Fiscal Operations

The State must conduct an annual fiscal on-site monitoring review of each local area's compliance with 2 CFR part 200, as required by sec. 184 (a) (4) of WIOA.

OOWD will conduct one annual fiscal on-site monitoring in accordance with Department of Labor (DOL) monitoring requirements. The annual schedule will run July to December.

Local Areas will also be subjected to financial year round desk reviews to check financial records and test compliance quarterly as reporting is being prepared for the 9130 Financial Report, and monthly during processing of expenditure reports and cash requests.





# Fiscal Operations , Cont.

Fiscal accountability of local area systems includes a review of the following functions:

- Administrative controls
- Fiscal Management Policies and Procedures
- Record retention policies and procedures
- Organization staffing
- Payroll records, and
- Contracting and procurement



# Best Practices Observed while Monitoring Fiscal Operations in WIOA

- Development of monitoring practices and tools that reflect what the State and Department of Labor utilizes to conducted monitoring.
- Implementation of effective monitoring practices that ensure sub-recipients are in compliance with Federal, State, and Local guidelines.
- Good written documentation, including monitoring reports, findings, corrective actions, and resolutions for each fiscal monitoring conducted.



# Recommendations to Reduce Findings

- Understanding Statutes, Regulations, and Guidance
- Ensuring costs are Allowable, Allocable, and Reasonable
- Retaining documentation to support financial transactions
- Asking questions



# WIOA Adult and Dislocated Worker Program

## Notable Changes

WIOA authorizes ***Career Services*** for Adults and Dislocated workers rather than core and intensive services. The three types of career services are Basic Career Services, Individualized Career Services, and Follow-up Services.

Local areas and service providers have the flexibility to target services to the needs of the customer as there is not a sequence of service requirement for Career Services, with the exception of the development of an Individual Employment Plan (IEP), for each individual determined eligible for Adult or Dislocated Worker (DLW) program services. (TEGL No. 19-16)

All references to sequence of service requirements should be removed from local forms and collateral materials.



# WIOA Adult and DLW Program changes, cont.

## *Transitional Jobs are*

- a new type of individualized career services for individuals under WIOA who are chronically unemployed or have an inconsistent work history,
- time-limited, subsidized work experiences,
- developed in public, private, or non profit sectors, and
- combined with comprehensive career and supportive services.

The goal of transitional jobs is to establish a work history for the individual, demonstrate success in the workplace and develop the skills that lead to entry into and retention in unsubsidized employment.

## *Example:*

Joe, a low-income non-custodial parent with a suspended driver's license, has had difficulty keeping a job due to a sketchy work history and the lack of a high school diploma. His goal is to go to work in the Warehouse Distribution Center 12 miles outside of his hometown, which pays \$15.00 per hour. The WIOA Career Planner will place Joe in a Transitional Job at the local food bank for 120 days, where he will load and unload trucks, and stocks shelves with non-perishable food items. Joe's Individual Employment Plan includes preparing for his high school equivalency exam and working toward getting his driver's license reinstated. Other needs and barriers include housing and transportation assistance, and work clothing. WIOA will assist with supportive services unavailable through workforce partners and other community service providers. The Career Planner and Joe will determine other career services necessary during his Transitional Job.



# WIOA Adult and DLW Program changes, cont.

## *Transitional Jobs, continued*

If local areas choose to use transitional jobs as part of their service delivery strategy, they must

- adopt policies which include
  - ✓ the planned reimbursement amount per placement,
  - ✓ the types of supportive services , and
  - ✓ limitations on the duration of the transitional job
- identify employers
  - ✓ may be public, private, or nonprofit
  - ✓ who can provide quality experiences for individuals to essentially obtain unsubsidized employment
- use no more than 10 percent of the funds allocated to the local area for transitional jobs.



# WIOA Adult and DLW Program changes, cont.

## Definitions:

**Basic Skills Deficient** – unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society.

**Dislocated Worker** – the definition of DLW now includes

- the spouse of a member of the Armed Forces on active duty who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or
- the spouse of a member of the Armed Forces on active duty and who meets the criteria of a displaced homemaker, i.e., the dependent spouse of a member of the Armed Forces on active duty, as defined above, and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the member, who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.



# WIOA Adult and DLW Program changes, cont.

An ***individual with a barrier to employment*** means a member of one or more of the following populations:

- Displaced homemakers.
- Low-income individuals.
- Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166.
- Individuals with disabilities, including youth who are individuals with disabilities.
- Older individuals.
- Ex-offenders.
- Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
- Youth who are in or have aged out of the foster care system.
- Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
- Eligible migrant and seasonal farmworkers, as defined in section 167(i).
- Individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.).
- Single parents (including single pregnant women).
- Long-term unemployed individuals.
- Such other groups as the State determines to have barriers to employment.





# General Observations from Adult and DLW Program Monitoring

- Extensive program notes in the case management system presented the opportunity to identify best practices and to determine what technical assistance may be needed.
- As observed in the Youth Monitoring Section, lengthy gaps in case or program notes can be avoided by following local policy.
- And, as mentioned in the Youth Section, alternate contact information, including social media addresses, obtained during early staff assisted services, may prevent extended gaps in communication with the program participant.



# Adult and DLW Best Practices

- Having clients with criminal backgrounds obtain “*Intent to Hire*” letters before enrolling in training programs may act as a litmus test to determine if local employers are open to hiring individuals with background issues. The practice of having the ex-offender request the letter from a prospective employer affords them a chance to explain to the employer how long ago the offense occurred and what they have learned from past mistakes.
- The use of locally developed *Community Resources Lists* to ensure resource and service coordination in the local area.
- Individual Employment Plans (IEPs), which included all required documents *uploaded together in OSL* under the label “IEP Packet”. This practice limited missing documents and the duplication often observed when required documents were entered separately.



# OOWA Outlook

As we continue with WIOA implementation, the OOWD will continue to build on our partnerships:

- With the local areas through more yearly outreach activities.
- With our Employment and Training Administration partners through continued regional calls and convenings.
- With local and regional groups and individuals to support local networking and regional capacity-building of Oklahoma's Workforce system.



# U. S Department of Labor

The Employment and Training Administration (ETA) maintains six regional offices whose staff monitor programs, services and benefits provided under the Workforce Innovation and Opportunity Act, Unemployment Insurance Program, Trade Adjustment Assistance Program, and other targeted grant investments.

The Employment and Training Administration (ETA) of the U.S. Department of Labor offers support, resources, technical assistance, tips and best practices through state and local workforce systems.

The support ETA provides helps support Oklahoma's WIOA Title 1 programs and facilitates Oklahoma having a successful program and fiscal review annually.



# Thank You!

If you have any questions, please contact the Policy and Program Staff in the Oklahoma Office of Workforce Development. Contact information can be found at:

<http://oklahomaworks.gov/about/>

[www.oklahomaworks.gov](http://www.oklahomaworks.gov)

