



UNITED STATES DEPARTMENT OF LABOR

Employment & Training Administration - Region 2

# WIA Boot Camp

## Most Common Compliance Findings



## Overview of session

- Review of areas of compliance for findings and concerns
- Most common findings by area of compliance
- Types of technical assistance for common findings
- Hearing from the audience: additional common findings from state monitors
- Questions and comments



# Comprehensive Review Areas of Focus

- Systems Design and Governance
- Program Management and Administration
- Financial and Grant Management Systems
- Service Delivery
- Performance Accountability



# Design and Governance

- MOU does not have a provision for duration (yes, that's actually in the law) and has expired (*WIA 20 CFR 662.300*)
- Youth Council- being inactive or not having required membership (*WIA 20 CFR 661.335*)



# Program Management and Administration

- Sites not handicapped accessible (*ADA; 42 U.S.C. 12181*)
- Lack of documentation of Selective Service registration (*WIA Sec.189(h)*)
- Lack of monitoring of service providers (*WIA 20 CFR 667.410*)



# Program Management and Administration

- Quarterly audits of WOTC certifications not being conducted (*ETA Handbook 408, Third Edition, Section VII*)
- Proper WOTC forms- 9063 and 9065, or alternatives- not being utilized (*Direct written National Office communication*)



# Financial & Grant Management

- Financial Reporting (*WIA 20 CFR 667.300*)-  
Incomplete or late reports; Reports not on an  
accrual basis accounting
- Cost allocation (*WIA 20 CFR 662.270, OMB Circulars  
A-21, A -87 and A 122*)- plans not in place or not  
being followed



# Financial & Grant Management

- Internal and budget controls (*29 CFR 97.20; Sec 95.21*)- lack of policies/procedures or not being followed; cost definitions not applied
- Cash management (*29 CFR 97.20; 29 CFR 95.21*)- advances or amounts of cash on-hand that are excessive



## Service Delivery

- Lack of post-placement follow-up for WIA Adults and Dislocated Workers (*WIA 20 CFR 663.150*)
- Lack of Follow-Up with WIA Youth post-exit (*WIA 20 CFR 664.410;664.450 and state or local policy*)
- Participants not exited after more than 90 days without contact (*USDOL, TEGl 17-05*)
- Extensive gaps in case management (*state or local policy*)



# Service Delivery

- Extensive gaps in case management for Youth and Adult/Dislocated Workers (*usually state or local policy*)
- Inconsistent development of Individual Service Strategy (ISS) for Youth (*WIA Sec. 129(c)(1)*)
- Inconsistent development of Individual Employment Plan (IEP) for Adults/Dislocated Workers (*State or local policy; WIA 20 CFR 663.245*)



# Types of Technical Assistance from DOL

- Staff training
- Providing materials to aid internal training
- Sharing evidence of best practices from other states or local areas
- Facilitating peer-to-peer opportunities



# Hearing from the audience

- State Monitors' findings
- Questions and comments