



SOUTH FLORIDA WORKFORCE INVESTMENT BOARD

WORKFORCE SYSTEMS IMPROVEMENT (WSI) COMMITTEE

**Thursday, April 16, 2009
8:00 A.M.**

Doubletree Miami Mart/Airport Hotel and Exhibition Center
711 NW 72nd Avenue
Palm Room
Miami, Florida 33126

AGENDA

1. Call to Order and Introductions
2. Approval of Workforce Systems Improvement Meeting Minutes
 - A. February 26, 2009
3. Informational - SFWIB Response to the Agency for Workforce Innovation's (AWI) Quality Assurance Report
4. Informational – Career Center Services Standardization Consultant
5. Recommendation as to the Approval of Revised On-the-Job (OJT) Policy
6. Recommendation as to Approval to Authorize Staff to Draft and Release a Request for Proposals (RFPs) for Work Readiness Services
7. Reallocation of Miami-Dade County Department of Human Services Refugee Employment and Training (RET) Funds



2.

SFWIB – Workforce Systems Improvement Committee

April 16, 2009

Minutes of SFWIB Workforce Systems Improvement Committee Meeting February 26, 2009

South Florida Workforce Investment Board
 Workforce Systems Improvement Committee Meeting
 February 26th, 2009, at 8:00 A.M.
 Doubletree Miami Mart/Airport Hotel and Exhibition Center
 711 NW 72nd Avenue, Miami, FL 33126

COMMITTEE MEMBERS IN ATTENDANCE	OTHER SFWIB MEMBERS IN ATTENDANCE	OTHER ATTENDEES
1. Fils-Aime, Sr., Daniel 2. DuBois, Victoria 3. Gaber, Cynthia 4. Huston, Jr., Al 5. Piedra, Obdulio 6. Roberts, Alvin	Margolis, Edward SFW STAFF Beasley, Rick Hernandez, Juan Soto, Roxanne	Flores, Oscar - <i>Arbor E&T, Inc.</i> Milan, Delia, - <i>City of Hialeah</i> Santé, Alicia - <i>Youth Co-op, Inc.</i> Yarosz, Thomas M. – <i>Vietnam Veterans Center for Independent Living of South Florida</i>
COMMITTEE MEMBERS NOT IN ATTENDANCE 7. Harder, Jackie 8. Manning, Anne 9. Socorro, Ivonne		Zeno, Miriam – <i>SER Jobs for Progress, Inc.</i>

Agenda items are displayed in the order they were discussed.

Call to Order and Introductions

Mr. Daniel Fils-Aime, Sr., WSI Committee Chairperson called the meeting to order at 8:14 A.M. and noted that no quorum had been achieved.

2. Minutes were not approved – lack of quorum. Quorum achieved at a later time.

3. SFWIB Strategic Planning Discussion

Committee members requested that this item be discussed at the full Board meeting.

4. Recommendation as to the Approval WIA Waiver Requests

Mr. Fils-Aime asked Juan Hernandez to present the WIA Waiver Request. Mr. Hernandez presented to the Committee the WIA Waiver Requests included in the agenda. He explained that the purpose of the WIA Waiver Requests was to facilitate the utilization of the stimulus dollars. Mr. Fils-Aime and members of the Committee reached a consensus to move the item forward to the full Board for approval.

[Mr. Al Huston, Jr. arrived 8:23A M]

5. State Monitoring (Audit) Review

Mr. Fils-Aime asked Juan Hernandez to give an overview of the State Monitoring (Audit) review. Mr. Hernandez stated the overall results from the review was a major improvement from the last one conducted two-years ago.

Mr. Huston stated that particularly in Miami-Dade County this is the right thing to do.

The Committee members reached a consensus to bring the Corrective Action Plan back to the next Committee meeting.

6. Quality Assurance – Development of Single Process

Mr. Fils-Aime asked Juan Hernandez to provide information on the Quality Assurance – Development of Single Process item. Mr. Hernandez explained the importance of having a quality workforce delivery system. He noted that the Committee members had previously recommended the standardization of the workforce services delivery system to improve the quality of the workforce.

Ms. Gaber asked if this is pertained to hiring a consultant and asked if there was a cost associated with the recommendation. She requested to have SFWIB staff provide the cost associated with the item.

Mr. Hernandez stated that an outside consultant may provide another perspective and be able to provide a better analysis of how to improve the quality of the Career Centers workforce services delivery system.

[Mr. Obdulio Piedra. arrived 8:37A.M.]

NOTE: A quorum has been achieved.

Mr. Alvin Roberts moved to approve the minutes of the December 18, 2008 meeting. The motion was seconded by Mr. Obdulio Piedra and the motion carried.

[Mr. Rick Beasley arrived]

Mr. Beasley, informed the Committee members of Governor Christ's visit to the West Dade Career Center on February 25th, 2009. Mr. Beasley shared with the Committee members on how we do things different from center to center. Mr. Beasley said that we need to look at how to simplify our process, streamline, and standardize on how we provide services. Mr. Beasley asked the Committee members to take a look to see how we can improve. Mr. Beasley stated that we have asked and had partners meetings on how to improve and they all use a different process. Mr. Beasley stated that having a standardize process will allow us to see the kinks and make improvements. Mr. Beasley suggested that it will be better to have a neutral party to tell us how we can improve. Mr. Beasley commented to have the consultant meet with the Board. Mr. Beasley stated that we need to get this done before the next fiscal year because the centers are swamped.

Mr. Piedra stated that there is no better time to proceed with this recommendation to consolidate, standardize to one practice that is followed by all and we can create a world class workforce service delivery system.

Mr. Piedra moved to approve the Quality Assurance Development of a Single Process to begin the process of having SFWIB staff engage a consultant. The motion was seconded by Mr. Alvin Roberts, and the motion carried.

Mr. Piedra moved to approve the WIA Waiver Requests to move forward to the full Board. The motion was seconded by Mr. Al Huston, Jr. , and the motion carried.

Mr. Piedra asked what the net result would be of approving the Waiver Requests. Mr. Hernandez answered that the Waiver Requests will provide flexibility to utilize the stimulus dollars.

Mr. Fils-Aime thanked the Committee and staff, and the meeting was adjourned at 8:55 A.M.



3.

SFWIB – Workforce Systems Improvement (WSI) Committee

April 16, 2009

SFWIB Responses to the AWI Workforce Service Delivery Quality Assurance Report

Informational

BACKGROUND

The Workforce Investment Act requires a statewide monitoring system and requires regular oversight and monitoring by each recipient of WIA activities and those of its contractors. The State of Florida’s monitoring system provide for annual on-site monitoring reviews of local regions to ensure compliance with the uniform administrative requirements required by WIA and to ensure that established policies to achieve program quality and outcomes meet the objectives of the Act and regulations.

The Agency for Workforce Innovations (AWI) conducted an on-site monitoring review of the South Florida Workforce Investment Board programs and services, including one-stop operations during the week of January 12-16, 2009. by the Agency for Workforce Innovation auditors. The workforce programs reviewed included: Workforce Investment Act (WIA), Welfare Transition, Wagner Peyser, Reemployment and Eligibility Assessment, Food Stamp Employment and Training, Trade Adjustment Assistance (TAA), Migrant and Seasonal Farmworker, and special projects. Additionally, staff conducted the annual data validation review during this same time period for the WIA and TAA programs.

The purpose of the review was to provide an assessment of the SFWIB’s compliance with the programs’ respective acts, regulations, state plans, and all contract or agreement terms.

The quality assurance report details programmatic findings, systemic issues, observations, recommendations and suggestions. In many cases there were no findings. The outcome of the review is detailed in sections and identified by the respective programs.

The Preliminary Exit Summary report was shared at the Service Partners meeting to start the SFWIB staff and the service partners’ collaboration in preparing the corrective action plan for the State. Through the Performance Improvement Teams (PIT) made up of service partners’ program supervisors/leads and SFWIB programs staff a corrective action plan has been developed.

On April 3, 2009, AWI in the attached letter accepted SFWIB’s Corrective Action Plan. In addition, the Region’s 2.06% error validation rate was lower than the State average of 2.58%.

Attached for the Committee’s review is the SFWIB’s Corrective Action Plan (CAP) for the Workforce Service Delivery Quality Assurance Report.

Attachment



Charlie Crist
Governor
Cynthia R. Lorenzo
Interim Director

April 3, 2009

Mr. Roderick Beasley, Executive Director
South Florida Workforce Board
Miami Airport Corporate Center
7300 NW Corporate Center Drive, Suite 500
Miami, Florida 33126

Dear Mr. Beasley:

The Agency for Workforce Innovation would like to thank you and staff of the South Florida Workforce Board for your participation and cooperation in the 2008-2009 quality assurance review of your workforce programs. Your Corrective Action Plan for resolving the findings identified in the report has been accepted. Consequently, this correspondence closes the quality assurance review process for the 2008-2009 review period.

Should you have any questions or require additional information, please contact Fay Malone at (850) 245-7420 or via e-mail at Fay.Malone@flaawi.com.

Sincerely,

Lois A. Scott, Program Manager
One-Stop and Program Support

LAS/omn

cc: Steve Urguhart
Charles Williams
Kevin Neal
Fay Malone

Agency for Workforce Innovation

The Caldwell Building, Suite 100•107 East Madison Street•Tallahassee, Florida•32399-4120
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WIA Data Element Validation Summary - PY 2006

REG	Elements Passed				
	AD	DW	NEG	OY	YY
1	201	126	636	125	510
2	230	94	313	138	514
3	0	0	0	0	0
4	60	0	0	0	360
5	362	746	495	698	1,181
6	0	0	0	0	0
7	0	0	0	0	0
8	1,104	371	0	0	40
9	0	0	0	0	0
10	832	499	56	332	731
11	770	229	0	432	334
12	0	0	0	0	0
13	0	0	0	0	0
14	849	604	0	819	416
15	0	0	0	0	0
16	408	73	0	47	105
17	534	473	15	1,441	176
18	353	81	0	40	21
19	0	0	0	0	0
20	0	0	0	342	525
21	0	0	0	0	0
22	409	1,536	515	0	0
23	236	1,398	345	1,249	3,520
24	226	160	2,342	103	72
SW	6,574	6,390	4,717	5,766	8,505

Elements Failed					
AD	DW	NEG	OY	YY	
8	2	23	14	44	
1	1	6	4	2	
0	0	0	0	0	
1	0	0	0	24	
29	24	2	29	23	
0	0	0	0	0	
0	0	0	0	0	
172	0	0	0	1	
0	0	0	0	0	
0	6	0	5	5	
2	0	0	9	22	
0	0	0	0	0	
0	0	0	0	0	
1	1	0	4	13	
0	0	0	0	0	
16	3	0	3	17	
89	4	0	9	3	
0	1	0	2	0	
0	0	0	0	0	
0	0	0	1	16	
0	0	0	0	0	
0	13	0	0	0	
0	3	1	26	112	
5	2	29	12	2	
324	60	61	118	284	

Missing Cases - All Elements Failed

Error Rate				
AD	DW	NEG	OY	YY
3.83%	1.56%	3.49%	10.07%	7.94%
0.43%	1.05%	1.88%	2.82%	0.39%
0.00%	0.00%	0.00%	0.00%	0.00%
1.64%	0.00%	0.00%	0.00%	6.25%
7.42%	3.12%	0.40%	3.99%	1.91%
0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%
13.48%	0.00%	0.00%	0.00%	2.44%
0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	1.19%	0.00%	1.48%	0.68%
0.26%	0.00%	0.00%	2.04%	6.18%
0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%
0.12%	0.17%	0.00%	0.49%	3.03%
0.00%	0.00%	0.00%	0.00%	0.00%
3.77%	3.95%	0.00%	6.00%	13.93%
14.29%	0.84%	0.00%	0.62%	1.68%
0.00%	1.22%	0.00%	4.76%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.29%	2.96%
0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.84%	0.00%	0.00%	0.00%
0.00%	0.21%	0.29%	2.04%	3.08%
2.16%	1.23%	1.22%	10.43%	2.70%
4.70%	0.93%	1.28%	2.01%	3.23%

Overall Error Rate		
PASS	FAIL	RATE
1,598	91	5.39%
1,289	14	1.07%
0	0	#DIV/0!
420	25	5.62%
3,482	107	2.98%
0	0	#DIV/0!
0	0	#DIV/0!
1,515	173	10.25%
0	0	#DIV/0!
2,450	16	0.65%
1,765	33	1.84%
0	0	#DIV/0!
0	0	#DIV/0!
2,688	19	0.70%
0	0	#DIV/0!
633	39	5.80%
2,639	105	3.83%
495	3	0.60%
0	0	#DIV/0!
867	17	1.92%
0	0	#DIV/0!
2,460	13	0.53%
6,748	142	2.06%
2,903	50	1.69%
31,952	847	2.58%

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>Welfare Transition (WT)</u></p> <p><u>Finding WT 23-01</u></p> <p>Initial Assessment and Individual Responsibility Plan Applicable reference: <u>45 CFR 261.11, 261.12, 261.14</u></p> <p>Twenty-six participant case files reviewed were coded as mandatory, open greater than 30 days. The team reviewed 24 participant case files to determine if an initial assessment was completed within 30 days of becoming eligible for cash assistance. Twenty of the 24 applicable participant case files (83.3 percent) had an initial assessment completed within 30 days from the open/reopen date posted in the OSST system and four (16.7 percent) did not.</p> <ul style="list-style-type: none"> • Of the 26 participant case files that were mandatory during the review period, 24 were required to have an IRP signed by the program participant during the review period. • Of the 24 participant case files reviewed for a signed copy of the initial or updated IRP, 23 (96 percent) had an IRP signed during the review period and one (4 percent) did not. 	<p>The SFWIB is required to assess the work history, skills, and employability of each individual referred for mandatory program participation. This information is used to assist program staff and program participants with establishing plans towards self-sufficiency. It should also be used to assign the participant to appropriate work activities and to offer support services to help the family overcome/manage barriers to self-sufficiency.</p> <p>The IRP is a map to achieving the participant's goals and services as an accountability tool for program staff. The IRP must inform the individual of each step that should be taken to achieve self-sufficiency. The steps to self-sufficiency should not consist of general language or policies. Steps to self-sufficiency should include:</p> <p>The activities the participant has been assigned to complete;</p> <ul style="list-style-type: none"> • The number of hours the participant must complete in each activity each week; • The deadline to turn in documentation signed by instructors, supervisors, and employers; and, • The participant's next appointment to meet with program staff. <p>Other IRP elements should include employment goals, services, and expected completion dates for each work activity. The SFWB's policy and procedural documents addressing assessments and the IRP are clear and provide adequate guidance on what the region requires when completing both the initial assessment and the IRP.</p>	<p>Staff should be reminded that the initial assessment must be completed within 30 days of the participant's case becoming mandatory. Program staff should also be reminded that a signed IRP must be in the participant's case file if the participant met with a career counselor and was assigned to an activity. The instances where these elements were not present appear to be an oversight and did not occur in enough participant case files to warrant training.</p>	<p>SFW Procedure Transmittal #1 PY08-09 Work Activities documents the requirement for participants to complete an initial assessment within 30 days of becoming mandatory in the Welfare Transition (WT) program. During our TANF Performance Improvement Team meeting, a review of this document was conducted, and staff was instructed to ensure that all participants complete an initial assessment within 30 days of becoming mandatory in the WT program. Additionally, the Career Centers as well as SFW staff conducts file reviews using the monitoring tool to ensure that each participant file contains an initial assessment as well as a signed IRP. If errors are discovered, contact is made with the Career Center regarding the necessary corrections. When a repeated error occurs for the same Career Center, a Performance Improvement Plan (PIP) is implemented which requires the Career Center to review all case files weekly for at least 1 month or until the error(s) cease to insure that each participant file contains a signed IRP and submits the report to SFW. SFW has also provided staff with an IRP Guide to assist them when working with participants; and to ensure that participants are clearly informed of required steps to self-sufficiency</p>

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIP Response</i>
<p><u>Finding WT 23-02</u></p> <p><u>Documentation of Hours Recorded on the Job Participation Rate Screen</u> <u>Applicable reference: 445.010, F.S</u></p> <p>Federal and State law require that engagement in work activities and participation hours recorded in OSST must be documented and auditable. Program staff enters hours of participation on the Job Participation Rate (JPR) screen in OSST and this data is used to report performance (participation rates). Nineteen of the participant cases had hours archived in the participation rates' full file. Those 19 participant case files were reviewed for documentation to support JPR entries that were archived when the participation rates were calculated 40 days after the end of the applicable quarter. Fifteen of the 19 participant case files (78.9 percent) contained documentation to support hours for each of the weeks recorded on the JPR screen and four (21.1 percent) participant case files did not.</p>	<p>No Comments</p>	<p>Recommendation: In order for Florida to retain its full block grant amount, documentation to support hours of participation reported must be retained in the case file according to federal guidelines. As of October 1, 2008, Florida is operating under the approved Work Verification Plan. Hours of participation must be verified by a designated party. The SFWB should instruct program staff on how to calculate job search hours when participants submit a job search form for hours submitted while conducting on site job search with employers. Documentation or other forms of allowable verification as described in the approved Work Verification Plan must be retained in the case file. Program staff should be instructed to:</p> <ul style="list-style-type: none"> • Review how to complete the time sheets or other forms of documentation with the participant; • Give a clear deadline for turning in documents to each participant and include the deadline in the steps to self-sufficiency; • Update the deadline for turning in documentation on the steps to self-sufficiency at each appointment; and • Review the documentation received to ensure all required information is included on the document (dates, participant's name, hours completed, activity, and provider). <p>Quality assurance program staff should also monitor participant case files on a regular basis to ensure hours for participation in countable work activities are documented according to the approved Work Verification Plan. Documentation must be retained in the participant's case file.</p>	<p>The recording of the hours should become easier as a result of the Job Participation Rate (JPR's) being updated on a monthly calendar. During our TANF Performance Improvement Team meeting, a review of this document was conducted, and Supervisors were reminded to train staff on how to interpret pay stubs, review verification of employment, and timesheets. Additionally, all forms used to track hours that are entered on the Job Participation Rate (JPR) screen were reviewed and/or revised as needed. In-house job search hours are used to record hours spent in job search. This is being tracked electronically through our Initial Assessment Application (IAA) system. Printouts of these hours are retrieved from the IAA system prior to recording the hours for participation. In addition to these processes, SFW also conducts quarterly case file and/or system desk reviews. If errors are discovered, contact is made with the Career Center regarding the necessary corrections. When a repeated error occurs for the same Career Center a Performance Improvement Plan (PIP) will be implemented which requires the Career Center to review all case files weekly for at least 1 month or until the error(s) cease to insure that each participant (JPR) matches the supporting documentation and submits the report to SFW.</p>

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>Finding WT 23-03</u></p> <p><u>Pre-penalty and Sanction Process</u> <u>Applicable reference: 45 CFR 261.10, 261.12, 261.13, 261.14, F.S. 414.065, Florida Administrative Code 65A-4.205 and Work Penalty Guidance</u></p> <p>Federal law requires the State to initiate its penalty process if the participant refuses to comply with work requirements or fails to comply with his/her signed IRP. Twenty-nine participants who were mandatory during the review period were cited for failing to comply with a program requirement. The penalty process outlined in the Florida Administrative Code and guidance paper was initiated in each of these 29 cases. Participant case files were reviewed to ensure the counseling process was implemented according to Florida Administrative Code and guidance. The following was observed:</p> <ul style="list-style-type: none"> • Of the 29 participant case files that had a pre-penalty initiated, 26 (89.7 percent) had an oral contact attempt documented in the system and three (10.3 percent) did not. The results are shown in Figure 4 – TANF • Five participants were sanctioned during the review period as a result of two failures within a 30-day period. These cases were reviewed to ensure: <ul style="list-style-type: none"> o The second failure cited was within 30 days of the first failure; o The participant was afforded three working days from the second failure date to provide good cause; and o The Failure to Demonstrate Satisfactory Compliance form, AWI WTP 2292, was mailed when the sanction was requested. <p>One participant case file indicated that the AWI WTP 2292 form was not mailed when the participant was sanctioned as a result of the second failure.</p>	<p>The SFWB has a detailed LOP outlining the sanction and counseling process. The LOP requires program staff to contact program participants immediately after they fail to meet program requirements. According to the LOP, staff are required to attempt to contact the customer by phone to find out why they missed the assigned activity (i.e., appointment or assigned work activity). If the Career Specialist reaches the customer, the customer will be informed that they must provide a good cause reason for the non-compliance, or if unable to provide good cause or agree to begin to comply, a sanction will be requested. If the customer agrees to comply, the Career Specialist will schedule an appointment to provide counseling regarding the consequences of noncompliance, the services the customer may need to help them become compliant, and to assign the customer to a work activity. The Career Specialist will document the results of this contact and/or attempt.</p>	<p>Based on the case files reviewed, it appears that program staff may have overlooked elements in the pre-penalty and sanction process. Program staff should review the requirement for making and notating the oral attempt to counsel the participants when they are noncompliant. Additionally, program staff should be trained to recognize when a second failure has occurred and when to mail the AWI-WTP form 2292 if a sanction is requested as a result of two failures within a 30-day period.</p>	<p>SFW requires staff to document in OSST case notes, and attempts to contact the participant prior to initiating the pre-penalty. A second attempt must be documented in case notes during the 10 day pre-penalty phase.</p> <p>A Pre-Penalty and Non-Compliance Training has been scheduled for March 26, 2009 with a focus on procedures for identifying and recording 2nd failures within a 30 day period. SFW will use the flowchart to assist in the Pre-penalty and Sanction procedure.</p>

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>Finding FSET 23-04</u></p> <p><u>Conciliation Appropriate but Not Started (Orientation/Notification to Participate)</u> <i>Applicable reference: 7CFR 273.7 (f)</i></p> <p>As soon as program staff members receive a referral from DCF, via the FLORIDA system, alerting the region of a mandatory participant, an appointment letter should be sent notifying the participant of orientation or a scheduled appointment. If the participant fails to report for the appointment, federal law requires that a determination be made as to whether “good cause” exists. If “good cause” does not exist and compliance is not established, the participant should be sent a Notice of Failure to Comply letter and placed in conciliation for ten days or until compliance is established, whichever comes first.</p> <ul style="list-style-type: none"> Of the 28 instances where conciliation was appropriate during the initial engagement process, there were two (7.1%) cases that did not have the conciliation process started. <p><u>Conciliation Appropriate but Not Started (Monitoring of Participation)</u> <i>Applicable reference: 7 CFR 273.7 (f), State Plan</i></p> <p>When participants are engaged in program activities, they are required to turn in documentation of completed hours on a regular basis. When a participant fails to turn in the required documentation, they should be sent a Notice of Failure to Comply letter and placed in conciliation.</p> <ul style="list-style-type: none"> Of the three cases engaged in activities where conciliation was appropriate, conciliation was not started in one (33.3%) case. 	<p>No comment</p>	<p>Program staff should ensure that participants are sent a Notice of Failure to Comply letter and placed in conciliation when they fail to attend orientation or a scheduled appointment, or fail to complete the required number of activity hours.</p>	<p>The Food Stamp Employment Training (FSET) Operations Specialist will conduct more trainings concentrating on FSET policy and proper procedures with emphasis placed on the time lines allowed for different events. This includes how to create system reminders so the case manager will know each day when a participant does not keep his/her appointment and what action needs to be taken. These trainings will continue on a regular basis. Staff completing their first or refresher policy training, a review exam is given at the end of each session. There are questions asked about the time lines for beginning conciliation.</p> <p>The FSET Operations Specialist will review cases in the OSST system for accuracy, which includes when conciliations were initiated and when sanctions were requested. If errors are discovered, contact is made with the case manager regarding the necessary corrections. Career Center Directors will be notified of consistent errors. When a repeated error occurs for the same Career Center a Performance Improvement Plan (PIP) will be implemented which requires the Career Center to review all follow-up appointments for 30 days to insure that all timelines are met and submits the report to SFW.</p>

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>Finding FSET 23-05</u></p> <p><u>Sanction Warranted but Not Requested (Conciliation/Sanctions)</u></p> <p><i>Applicable reference: 7 CFR 273.7 (f)</i></p> <p>Federal requirements indicate that as soon as program staff members learn of a participant's noncompliance with program requirements, a determination must be made as to whether "good cause" exists. If "good cause" does not exist and compliance is not established, the participant's noncompliance should be reported to DCF by way of a sanction request. Of the 37 instances here a sanction request was warranted, there were 32 cases (86.5 percent) that had a sanction requested and five (13.5%) cases where a sanction request was not initiated.</p>	<p>No Comment</p>	<p>Program staff should ensure that sanctions are requested for participants who are noncompliant with program requirements. If a participant fails to respond to the Notice of Failure to Comply letter and if "good cause" has not been established, staff should report the noncompliance to DCF by entering a sanction request in the OSST system.</p>	<p>The FSET Operations Specialist will continue to conduct trainings concentrating on FSET policy and proper procedures with emphasis placed on the time lines allowed for different events. This includes how to create system reminders so the case manager will know each day when a participant does not keep his/her appointment and what action needs to be taken. These trainings will continue on a regular basis. Staff completing their first or refresher policy training, a review exam is given at the end of each session. There are questions asked about the time lines for requesting a sanction.</p> <p>The FSET Operations Specialist will review cases in the OSST system for accuracy, which includes when conciliations were initiated and when sanctions were requested. If errors are discovered, contact is made with the case manager regarding the necessary corrections. Career Center Directors will be notified of consistent errors. When a repeated error occurs for the same Career Center a Performance Improvement Plan (PIP) will be implemented which will require the Career Center to review all follow-up appointments for 30 days to insure that all timelines are met and submits the report to SFW</p>

**South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report**

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>WIA ADULT AND DISLOCATED WORKER</u></p> <p><u>The sample size consisted of 24 WIA participant case files (17 adult and seven dislocated workers).</u></p> <p>The WIA review focused on compliance with federal, State, and local guidelines and requirements to ensure that all participant case files contained evidence that participants were eligible for program participation, and were enrolled in allowable activities and in demand occupational training. The participant case files were also reviewed to determine if those participants who entered employment were placed in jobs that offered self-sufficient wages as defined by local policy, if credentials/certifications were recorded in the State MIS, and if follow-ups were performed timely.</p>	<p>The review did not reveal any findings.</p>	<p>No Recommendation</p>	
<p><u>WIA YOUTH PROGRAM</u></p> <p><u>The sample size consisted of 22 WIA participant case files (16 younger and six older youth).</u></p> <p>The youth participant case files were reviewed for documentation that substantiates program participation information recorded in the system. The review focused on participation data to determine if the youth met age requirements for their respective customer groups and if the youth had at least one of the federal/local barriers. Participant case files were also reviewed to determine whether youth assessed as basic skills deficient (reading or math scores below the ninth grade level) received basic skills remediation. Participant case files were further reviewed to ensure that all formula-funded youth exiting the program had received required follow-up services at the required intervals after exit.</p>	<p>The review did not reveal any findings.</p>	<p>No Recommendation</p>	

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>SYSTEMIC ISSUES</u></p> <p><u>Credential Attainment/Recording of Credential</u> <i>Applicable reference: AWI Guidance, TEGL 17-05</i></p> <p>Federal and State guidance reports documentation of credential attainment to be recorded in the State MIS. If a credential was attained, the attainment date and type must be accurately entered in the State MIS bases on documentation included in the participant's case file.</p> <p><u>WIA Youth</u></p> <p>Of the three participant case files with a credential attainment recorded in the State MIS, two participant case files (66.7 percent) contained information to support that the credential attainment information was accurately recorded. The remaining one (33.3 percent) did not.</p>	No Comment	<p>The SFWB should ensure that all credentials recorded in the State MIS have supporting documentation maintained in the participant case files. The documentation should match the credential attained dates entered in the State MIS. Program staff should periodically conduct peer reviews. The SFWB should also remind program staff that failure to document credentials reported in the State MIS may negatively impact data validation results.</p>	<p>Youth Staff conducted a mandatory two day training session with all contracted youth providers on February 11-12, 2009. Topics communicated detailed the eligibility through the follow up process requirements:</p> <ul style="list-style-type: none"> ● WIA Youth Eligibility Process and required source documentation ● Completing the WIA MIS Forms and Instructions ● Completing the Individual Service Strategy, Youth Goals and Literacy and Numeracy ● Credentials – attainment of, proper documenting in EFM, hard copy documentation to be maintained in the file, recording of date attainment and how to search system to verify information was correctly entered in EFM. Provider Youth Program Managers were instructed to review EFM system on a regular basis. Youth Staff detailed the cause and effect of not entering the correct information into the EFM. ● Job Placement ● Program Exit and Follow-ups ● EF-Data Entry ● Monthly Management Reports – MMR

**South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report**

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>OBSERVATION</u></p> <p><u>WIA Youth</u></p> <p>Several participant case files revealed that individuals who remained in the program after their 18th birth date did not have documentation of selective service registration.</p>	<p>The SFWB was advised that case managers should be reminded that youth who remain in the program on or after their 18th birth date must provide documentation of selective service registration and placed in the participant's case file.</p>	<p>No Recommendation</p>	<p>Youth Staff, at the February 11-12, 2009, training session, provided instructions for selective service registration, collecting information on youth who are not age appropriate to register for selective service and maintaining the documentation in the participant's file. Also, it was conveyed that if a youth becomes of age for selective service registration while enrolled in the provider's program and the provider does not ensure that the youth is register for selective service, the youth is in jeopardy of having to be exited from the program, which could affect their performance. The Youth Staff will send out monthly reminders to the providers.</p>

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>WAGNER-PEYSER (WP)</u></p> <p><u>Finding WP 23-06</u></p> <p>Job Placement <i>Applicable reference – 20 CFR 651.10</i></p> <p>Job Seekers</p> <p>A job placement has specific requirements as defined in federal law. There were two (22 percent) of nine job seekers that were placed on non-agriculture job orders in which the job seeker was determined to have been employed prior to the referral. The results are shown in Figure 6a-WP.</p> <p>Job Orders</p> <p>There were four (36 percent) of 11 job orders with placements in which the job seeker was identified as having a specific hire date that was prior to the job seeker’s job development contact/referral date to the employer. The results are shown in Figure 6b-WP.</p>	<p>No Comment</p>	<p>Job orders and referral of job seekers should not be entered in EFM to capture placements after the job seeker has been hired by the employer, unless it is a job development job order and the job seeker received a job development referral to the employer prior to being hired. It is recommended that staff review the federal placement definition</p>	<p>The Career Centers have been advised of the federal placement definition for the placement credit for both job developments and for placements. The Job Bank is monitoring the placement activity of job developments and deleting the job development job order if done in error</p>

**South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report**

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>Finding WP 23-07</u></p> <p><u>Job Development</u> <i>Applicable reference – 20 CFR 651.10</i></p> <p>A job development has specific steps that must be followed as defined in federal law. A job development is written to take credit for placement of a specific job seeker who has been hired by an employer for a specific job that has been developed by staff for that specific job seeker. The job development service is entered on the job seeker's service screen. When staff verify that the job seeker was placed on a job with the specific employer, a job order is written, the job seeker is referred and a placement is taken.</p> <ul style="list-style-type: none"> • Two (40 percent) of the five job developments on job seekers did not meet the federal definition of a job development. Three (60 percent) met the definition. Of the three job development job orders that were reviewed, none (100 percent) met the federal definition of a job development job order. • One job development did not meet federal requirements because the job seeker was employed with the employer prior to the job development contact/referral being made to the employer. 	<p>It is recommended that all staff who perform Wagner-Peyser program duties be trained on the job development process. A training presentation detailing the job development process is available on Wagner-Peyser Services in EFM and on the job development job order on Job Orders located on the AWI website</p>	<p>No Recommendation</p>	<p>Corrective action was taken effective January 1, 2009. All job development activity, including job order and placement, in Region 23 is monitored daily by the Job Bank Staff. The review tool listed below is used to insure that proper procedures are followed. Career Center Directors and appropriate staff are notified weekly as to job development errors. When a repeated error occurs for the same Career Center, a Performance Improvement Plan (PIP) will be implemented. The Career Center will be required to monitor all their Job Development Placements using the review tool below for at least a 90 day period or until errors cease.</p> <p>In addition to the review tool, job development job order training is provided to new staff on an on-going basis. Region 23 recognizes the value of job developments when there are no suitable openings on file.</p> <p>The training information listed above will be reviewed by all staff entering job orders and will also be incorporated into the Wagner Peyser training for all new staff</p>

South Florida Workforce Investment Board, Region 23
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<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>Finding WP 23-08</u></p> <p><u>Priority Re-employment Planning Program Assessments</u></p> <p><i>Applicable reference – FL Administrative Code 60BB-3.028 Profiling and Re-employment Services</i></p> <p>The State of Florida requires that a personal assessment be conducted on Priority Re-employment Planning (PREP) program participants. There were no personal assessments being conducted on PREP participants in the session the reviewer attended, although the region enters an “Individual Assessment” service in EFM.</p>	No Comment	<p>It is recommended that the region begin the assessment process as required based on the questionnaire information collected, and that staff who are involved in the PREP process review the PREP Handbook to ensure that they are conducting this program in compliance with applicable rules.</p>	<p>Staff has recently observed all PREP classes throughout the region. Currently, there are six</p> <p>(6) local offices conducting the PREP classes. Staff will meet with the six (6) PREP Instructors to discuss the possibility of unifying all PREP classes and advising them on Personal Assessments</p>

South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>SYSTEMIC ISSUES</u></p> <p><u>Staffing Agency Job Orders</u></p> <p><i>Applicable reference: Job Order Training Presentation</i></p> <p>There were five job orders that were input by employers that were listed as staffing agencies on their industry code. The Wagner-Peyser requirement is that all positions offered by staffing agencies carry the phrase “Positions offered by no-fee agency.”</p>	<p>It is suggested that staff review the current job listings for staffing agency employers to make sure the phrase is included in the description on all job listings.</p>	<p>No Recommendation</p>	<p>Corrective action was taken effective January 1, 2009. All job development activity, including both job order and placement, in Region 23 is monitored daily by the Job Bank staff. The review tool listed below is used to insure that proper procedures are followed. Career Center Directors and appropriate staff are notified weekly as to job development errors. When a repeated error occurs for the same Career Center, a Performance Improvement Plan (PIP) will be implemented. The Career Center will be required to monitor all their Job Development Placements using the review tool below for at least a 90 day period or until errors cease.</p> <p>In addition to the review tool, job development job order training is provided to new staff on an on-going basis. Region 23 recognizes the value of job developments when there are no suitable openings on file.</p> <p>The training instructions listed above will be reviewed by all staff entering job orders and will also be incorporated into the Wagner Peyser training for all new staff</p> <p>See Exhibit A</p> <p>Wagner Peyser Monitoring Tool Job Development Placements order form</p>

**South Florida Workforce Investment Board, Region 23
Response to the 2009 Workforce Service Delivery Quality Assurance Report**

<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>RE-EMPLOYMENT AND ELIGIBILITY ASSESSMENT PROGRAM (REA)</u></p> <p><u>Finding REA 23- 09</u></p> <p><u>Documentation of an Assessment</u> <i>Applicable reference: REA Contract, REA training presentation</i></p> <p>In conducting the review of the REA files, it was found that three (33.3 percent) of the ten files reviewed were missing assessment documentation.</p>	<p>No Comment</p>	<p>The one-stop career center with the missing documentation was visited and technical assistance was provided. The one-stop career center should mail the questionnaire with the REA letter and keep the questionnaire in the REA file as the assessment documentation</p>	<p>The Career Center in question mails the question with there Re-Employment and Eligibility Assessment (REA) letter. They also have questionnaires for the REA Applicant if the applicant forgets it. The REA Coordinator reviews and assists the client in answering the questionnaire. Finally the REA Coordinator keeps the questionnaire in the applicants REA file as assessment documentation</p>

South Florida Workforce Investment Board, Region 23
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<i>Findings</i>	<i>Comment</i>	<i>Recommendation</i>	<i>SFWIB Response</i>
<p><u>ONE-STOP CREDENTIALING</u></p> <p><u>Finding OSC 23-10</u></p> <p><u>Tier I Certifications and Continuing Education Hours</u> <i>Applicable reference – One-Stop Credentialing Final Guidance AWI FG 02-032</i></p> <p>The One-Stop Credentialing guidance states that “newly hired front-line staff must attain the Tier I certification within six months of their hire date. For this purpose, front-line staff is defined as “any individual who works primarily with customers, either participants or employers.” These guidelines are the basis for the Tier I certification, as well as the annually required 15 hours of continuing education. Of the 55 staff hired during the review period, the region had eight staff (14.5 percent) that had not completed the required Tier I certification within the first six months of employment. A listing of staff who have not completed the Tier I certification is attached.</p>	<p>No comments</p>	<p>It is essential that staff be aware of all facets of workforce services that are covered by the Tier I coursework. One-stop career center managers must allow time for staff to complete the Tier I certification within the first six months of employment and the annually required 15 hours of continuing education. The region must ensure that the individuals listed who have not completed the Tier I certification comply with this requirement within six months of receipt of this report. A copy of the certification documenting compliance must be provided to AWI at that time</p>	<p>See Exhibit B: New Hire Staff Tier 1 Report</p>

South Florida Workforce Investment Board, Region 23
 Response to the 2009 Workforce Service Delivery Quality Assurance Report

Exhibit A

WAGNER PEYSER MONITORING TOOL JOB DEVELOPMENT PLACEMENTS	
<u>JOB DEVELOPMENT ORDER</u>	JOB ORDER #: Staff Name # : Career Center:
<p style="color: blue;">This review targets all job orders with Job Development (JD) placements only. JD job orders will be screened for appropriate annotations in Employ Florida.</p>	
1. Were the job order date and the placement post date the same? <i>(JD job orders and placement result must occur on the same date)</i>	YES [X] NO []
2. Was the JD service date prior (more than 1 day) to the job order date? <i>(JD referral/contact must occur prior to placement)</i>	YES [X] NO []
3. Was the company on the job orders the same as the company name in Job Development service comments? <i>(JD contacts/referrals must be employer specific).</i>	YES [X] NO []
4. Were the number of openings and the number of referrals and the numbers of placements the same? <i>(JD job orders must be tied to individual job seekers and employer)</i>	YES [X] NO []
5. Is there an entry on Job Order Statistics/Applicant Information/Action in the "Notes Created" section for verification? <i>(All JD placements must be verified and noted on this screen)</i>	YES [] NO []
6. Comments:	
# of Errors:	

South Florida Workforce Investment Board, Region 23
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Exhibit B

<i>Newly Hired Staff</i>	<i>Career Center</i>	<i>Date Hired</i>	<i>Certified</i>	<i>Not Certified</i>
	Transition			
Yexet Hernandez		7/21/2008	Y	
Saimary Rivero		7/21/2008	Y	
Luis Gonzalez		8/4/2008	Y	
Maria Del Carmen Alvarez			Y	
Martin Morales			Y	
Selena Dukes-Johnson			Y	
Jacqueline King-Coats			Y	
Wilson Prichete		3/5/2007	Y	
Mora Luz		3/5/2007	Y	
	Carol City CC			
Mercedes Batista		3/12/2007	Y	
Elizabeth Sanfiel		10/29/2007	Y	
Edith Reyes		10/29/2007	Y	
Rene Castellanos		1/22/2008	Y	
Jimmy Nickerson		1/22/2007	Y	
Vanessa Daza		1/28/2008	Y	
Gladys Becerra		3/3/2008	Y	
Jacqueline Marzan		5/5/2008	Y	
Eduardo Estebanez		8/26/2008	Y	
Delores Bedoya		8/25/2008	Y	
	Hialeah Gardens			
Maria Fernandez	Certified 1/27/09	11/26/2007	Y	
Belkys Marmol		12/10/2007	Y	
Otano Sumaylin		4/2/2008	Y	
Sarah Llranzo		8/11/2008	Y	
Yamile Janier		8/11/2008	Y	

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<i>Newly Hired Staff</i>	<i>Career Center</i>	<i>Date Hired</i>	<i>Certified</i>	<i>Not Certified</i>
	Little Havana			
Rafael Gonzalez		7/1/2007	Y	
Rodney Fernandez		7/1/2007	Y	
Reynaldo Leal		7/1/2007	Y	
Olga Natal		7/1/2007	Y	
Yolanda Johnson		10/1/2007	Y	
Michele Ramirez		10/1/2007	Y	
Richard Ramos		10/1/2007	Y	
Diana Martinez		10/1/2007	Y	
Ann Raudez		10/1/2007	Y	
Elia Fajardo		10/1/2007	Y	
	Hialeah Downtown			
No Newly Hired Staff		All Tier I Certified		
	Perrine Career Center			
Thias Yanes		3/26/2007	Y	
Karla Logos		7/9/2007	Y	
Paloma Castas		9/17/2007	Y	
Lizzie Lazano		10/15/2007	Y	
Maria Maldona		10/16/2007	Y	
Amber Caridad		10/22/2007	Y	
Maria Castillo		10/23/2007	Y	
Gloria Rivera		12/4/2007	Y	
Karelys Guterrez		2/19/2008	Y	
Robert Ponte		3/12/2008	Y	
Omar Mendoza		8/18/2008	Y	
Carmen Andreu		10/20/2008	Y	
Ramon Nodal		11/3/2008	Y	

**South Florida Workforce Investment Board, Region 23
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<i>Newly Hired Staff</i>	<i>Career Center</i>	<i>Date Hired</i>	<i>Certified</i>	<i>Not Certified</i>
	West Dade CC			
Tellez Grettel		11/7/2007	Y	
	Key West CC			
Mercedes Drake		11/26/2007	Y	
Anne Smith		1/23/2008	Y	
	Northside CC			
All staff was hired		1-2-08 or 4-1-08	Y	
	Miami Beach CC			
Gisel Shull	Certified 1/15/09	1/3/2007	Y	
Ada Rancano		4/23/2007	Y	
Artura Varela	Certified 1/10/09	9/14/2007	Y	
Roberto Ortega	Certified 1/13/09	11/1/2007	Y	
Luis Gonzalez		4/21/2008	Y	
Gabriel Paez	Certified 1/12/09	11/3/2008	Y	
Fabio Ramirez	Certified 1/5/09	11/12/2008	Y	
Stephanie Duque	Certified 1/13/09	11/12/2008	Y	
Claudia Elorza		10/29/2008	Y	
	North Miami Beach			
Ileana Arias		7/12/2007	Y	
Nandwani America		10/1/2007	Y	
Alex Duran		8/27/2007	Y	
Avignon Marie Yves		8/15/2008	Y	
Maria Barquin	Certified 1/22/09	7/1/2008	Y	
Elena Mendoza	Certified 1/23/09	7/1/2008	Y	
India Auguste	Certified 1/23/08	4/18/2008	Y	
Maria Leticia Marroquin	Certified 1/26/08	07/01/2007	Y	
	Homestead			



4.

SFWIB – Workforce Systems Improvement (WSI) Committee

April 16, 2009

Career Center Services Standardization Consultant

Informational

BACKGROUND

There is overwhelming evidence that the quality of the workforce is critical to a positive regional business climate. Economic development, as well as education and training professionals and their respective agencies continue to be challenged by prospective business expansions and relocations to ensure an adequate supply of highly skilled talent.

The Workforce Systems Improvement (WSI) Committee has previously suggested that we standardize the Career Centers workforce services delivery system to improve the quality of the workforce.

At the February 26, 2009 WSI Committee meeting a discussion was held to begin the development of a single process by having a consultant review the service delivery systems at the Career Centers. This would assist SFWIB in gaining awareness of the organization's procedures and analyzing them to identify sources of errors, defects, and inefficiencies. It is designed to provide an in-depth understanding that can then be used to develop improvements.

The WSI Committee recommended that a Consultant be procured to review and assess the Region's service delivery systems at the Career Centers.

This item was discussed at the February 26, 2009, Board meeting, but no action was taken.

SFWIB staff has requested quotes from the following consultant services:

- Bob Bradner of Bradner Consulting Group
- John Metcalf of Corporation for Skilled Workforce
- Tsilia Blomberg of Florida Manufacturing Extension Partnership (MEP)



5.

SFWIB – Workforce Systems Improvement (WSI) Committee

April 16, 2009

Recommendation as to the Approval of Revised SFWIB OJT Policy

RECOMMENDATION

SFWIB staff recommends the approval of the revised SFWIB OJT Policy as set forth below.

BACKGROUND

SFWIB staff has worked with the Service Partners and developed the attached draft revised OJT Policy. This Policy revises the current policy by adding the following:

1. Under Section V – Definition - replaced the 50% of the wage rate of the participant with “not to exceed program specific guidelines”.
2. Under Section VIII – Conditions:
 - Section A-2 – General - removed part-time employment,
 - Section B-2 – Duration - replaced the 1,040 hours with, 2,080 hours and replaced six consecutive months,
 - Section C-1 – Compensation - replaced \$8,000 per participant with \$10,000 per participant,
 - Section C-4 – Compensation - replaced the 50% of the total wages paid by the employer to the participant during the period of training, with “shall not exceed program specific guidelines, for the costs of providing the training and additional supervision related to the training; and reimbursement of the participant’s wage rate.”

Attachment



POLICY TRANSMITTAL

SUBJECT:	On-The-Job Training	Policy/Guidance No.: PY2008-2009
APPLIES TO:	Career Center Operators	Effective Date:
		Revised Date: 4/1/2009
		Expiration Date: Indefinite
REFERENCES:	Public Law 105-220, Workforce Investment Act of 1998 Florida Title XXI, Chapter 445.024(2), Workforce Innovation Act of 2000 20 CFR 627.240 SFWIB Self-Sufficiency Standard CFR 400.154 (c) CFR 400.81 (a) (8) Federal Register – Reauthorization of TANF final rule 02/05/08, Department of Human Services 261.2(f) Florida’s Work Verification Plan, 10/02/08	

I. OF INTEREST TO

The On-the-Job Training (OJT) Policy should be of interest to members of the South Florida Workforce Investment Board (SFWIB), South Florida Workforce Investment Board staff, South Florida Workforce Investment Board Service Partners, Training Partners, Employers, Job Seekers, and workers in Miami-Dade and Monroe counties.

II. SUBJECT

On-the-Job training (OJT).

III. PURPOSE

The purpose of the OJT Policy is to provide all SFWIB stakeholders with parameters regarding the use of training funds through OJT agreements.

IV. BACKGROUND

Title 1 of the Workforce Investment Act (WIA) defines that **On-the-Job Training (OJT)** be “provided under contract with an employer in the public, private non-profit, or private sector.

Approved By: Rick Beasley, Executive Director	Replaces PY 2005 Rev. D#PY 2008 Revision 04/01/2009	Issued by: Adult Programs
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Through the OJT contract, occupational training is provided for participants in exchange for the reimbursement of up to 50 percent of the wage rate to compensate for this employer's extraordinary costs." OJT is an ideal service strategy, since it is specifically designed to address unique, individual needs and interests.

As per the Agency for Workforce Innovation, Regional Workforce Development Boards (RWDBs) establish policies to administer OJT programs, include OJT as part of the local planning process, and by establishing the conditions for an OJT approach to worker training (in addition to the ITA [individual training account] approach.)¹ SFWIB has complied with this guidance by including OJT as part of the SFWIB Training Master Plan. The policy outlined herein details the conditions for using OJT.

It should be noted that OJT is a vehicle through which SFWIB can expend training dollars from various funding streams. OJT is provided as one option within the scope of overall training services provided within the Region. This policy does not address the unique performance and compliance requirements of these funding streams.

V. DEFINITIONS

A. *On-the-Job Training (OJT)*²

OJT means training by an employer that is provided to a paid participant while engaged in productive work in a job that:

1. Provides knowledge or skills essential to the full and adequate performance of the job;
2. Provides reimbursement of the participant's wage rate to the employer not to exceed program specific guidelines, for the costs of providing the training and additional supervision related to the training; and,
3. Is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

B. *Credentials*

Credentials include, but are not limited to, a high school diploma, including special diplomas; GED or other recognized equivalents; post-secondary degrees/certificates; recognized skill standards such as occupational completion points (OCP); licensure or industry-recognized certificates; and, successful completion of OJT and Customized Training.³ SFWIB will accept local credentials that are also accepted for state and federal performance, on a case by case basis.

VI. ELIGIBILITY

A. *Employers*

¹ STATE: AWI FG 00-009

² FEDERAL: Public Law 105-220, WIA 1998, Sec. 101 (31)

³ FEDERAL: TEGL 7-99

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Employers that meet the criteria (including financial viability) and dependent upon available funding, deliver OJT through an executed OJT agreement with an approved SFWIB employer.

B. *Job Seekers*

Job seekers that meet the following criteria may, depending on funding availability, receive OJT through an executed OJT agreement between an eligible employer and an approved SFWIB partner.

1. Eligibility requirements for a SFWIB funded program, such as WIA Youth, WIA Adults, WIA Dislocated, TANF, Refugee, etc.;
2. After an interview, evaluation, and assessment have been determined not to be fully skilled in the chosen occupation⁴, in need of Training Services, and have the skills and qualifications to successfully complete the OJT;
3. Select a program of training that is directly linked to the employment opportunities in the local area; and,
4. Unable to obtain grant assistance from other sources to pay the cost of training, or require SFWIB assistance in addition to other sources of assistance, including but not limited to scholarships, employer reimbursement programs, Federal Pell Grants, etc.

C. *Employed Workers*

Employed workers that meet the following criteria may, depending on funding availability, receive OJT through an executed OJT agreement between an eligible employer and an approved SFWIB partner.⁵

1. Not earning a self-sufficient wage;⁶
2. OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills or workplace literacy;
3. Skills to be learned are in demand and portable within the industry; and,
4. OJT agreement documents a plan for job retention or wage progression at the end of the contracted training period.

D. *Training Providers*

Training providers must qualify as eligible service providers per local and state criteria, including meeting locally established performance measures to remain on the OJT Eligible Provider List. Providers receiving funding shall use OJT as one of the training options available to clients.

VII. EXPECTED OUTCOMES

⁴ FEDERAL: 20 CFR 627.240 (b)(4)(i)

⁵ STATE: AWI FG 00-006

⁶ LOCAL: SFWIB Self-Sufficiency Standard

Approved By: Rick Beasley, Executive Director	Replaces PY 2005 Rev. D#PY 2008 Revision 04/01/2009	Issued by: Adult Programs
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A. *Job Seekers (Unemployed)*

Job seekers should obtain full-time, unsubsidized employment, preferably with the contracted employer, at a wage equal to or higher than the OJT wage. Participants eligible for an OJT are those who would not have been hired by an employer due to lack of qualifications/skills and who have been determined to be in need of the training to be productive in the occupation.

B. *Employed Workers*

1. Employed workers should continue employment, preferably with the contracted employer⁷, at a wage equal to or higher than the OJT wage; and,
2. Earn a credential.

VIII. CONDITIONS

A. *General*

1. OJT is a training activity, not a hiring activity. A placement is achieved when the participant completes the training period and enters unsubsidized employment.
2. Eligible OJT providers must use the standard OJT agreement provided by SFWIB in procedural guidance.
3. OJT may occur for full-time employment only.
4. Ongoing attainment of competencies must be documented.
5. OJT may be sequenced with, or accompanied by, other types of training, such as remedial education, basic skills training or occupational skills training.⁸
6. In order to meet the needs of the employers, some aspects of the OJT agreements have to be negotiated and these may include but are not limited to:
 - a. Percent of Reimbursement
 - b. Frequency of Payment
 - c. Timeframe for achievement of competencies
 - d. Quality Assurance Process

B. *Duration*

1. OJT is limited in duration, as appropriate, for the participant to acquire the skills needed for the OJT position.⁹ The agreement will note the specific vocational preparation (SVP) for the occupation.¹⁰
2. Eligible Service Providers and Training Providers may not execute OJT agreements exceeding 2,080 hours over twelve consecutive calendar months. This includes time spent in related classroom training activities for which the employer pays wages.¹¹

⁷ FEDERAL: 20 CFR 627.240 (a)(2)

⁸ FEDERAL: 20 CFR 627.240 (a)(3)

⁹ FEDERAL: 20 CFR 627.240 (b)(1)

¹⁰ LOCAL: #PY-2005-01 Rev. D

¹¹ FEDERAL: 20 CFR 627.240 (1) / (2) / (3)

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3. The actual duration of the OJT agreement may be negotiated with the employer, within the parameters noted above.

C. *Compensation*

1. Eligible Service Providers and Training Providers may not execute OJT agreements exceeding a total possible employer compensation of \$10,000.00 per participant, without prior written SFWIB approval.
2. Participants employed under an OJT agreement shall be compensated by the employer at the same rates, (including periodic increases) as similarly situated employees. In no event, however, shall OJT participants be paid less than the higher of the minimum wage specified under the Fair Labor Standards Act of 1938, as amended or the applicable State or local minimum wage.¹²
3. Participants employed under a SFWIB OJT agreement shall receive the same fringe benefits and be subject to the same working conditions granted to regular employees under the same or similar occupational title. The employer will bear the full cost of fringe benefits for OJT participants, including holiday pay, insurance, taxes, etc.
4. Payments to an employer under an OJT agreement shall not exceed program specific guidelines, for the costs of providing the training and additional supervision related to the training; and reimbursement of the participant's wage rate.¹³
5. OJT payments may not be based on overtime, shift differential, premium pay and other non regular wages paid by the employer to participants.¹⁴
6. Employers must submit certified payroll records, as part of the invoice process, in order to receive the applicable reimbursement.¹⁵

D. *Grievances and Appeals*

Participants must be advised of their right of appeal using either the employer's grievance procedures, or those of the SFWIB, if previously agreed with the employer. If an employer elects to use its own grievance procedures, the employer must agree to provide information to SFWIB as to actions taken under those procedures. If the participant is not satisfied with the outcome after using the employer's grievance procedures, then he/she may elect to file a grievance with SFWIB under the SFWIB grievance procedures.

E. *Limitations*

1. A Service Provider agency or jurisdiction may enter into an OJT agreement with another branch or department of the agency or jurisdiction, if the other branch or department is not funded by the SFWIB.
2. Whenever a single employer is identified as needing more subsidized

¹² FEDERAL: 20 CFR 627.240 (e)

¹³ LOCAL: OJT Operating Procedures

¹⁴ FEDERAL: 20 CFR 627.240 (c)(2)(iii)

¹⁵ Local: Although 29 CFR Subtitle A Parts 3 & 5 requires federal contractors, subject to Davis-Bacon and related acts, to submit certified payroll, the SFWIB chooses to require this of any employer seeking reimbursement through an OJT agreement with an approved SFWIB partner.

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training (OJT + Customized Training) than the limit specified in the SFWIB Training Master Plan, in a single program year, through agreements with any number of eligible SFWIB partners, the funding must first be approved, in writing, by the SFWIB Executive Director.¹⁶

F. *Prohibitions*

1. OJT activities may not commence prior to the employer, participant, and Service Provider fully executing the agreement.
2. OJT will not be allowed for training in occupations with high turnover.
3. Agreements are not allowable where the source of income includes tips, commissions, or piecework.
4. No agreement may be written with any company which results in the dislocation of any employee. This includes partial displacement such as reduction in hours of non-overtime work, wages or employment benefits.
5. No agreement may be written with any company, which has relocated into Miami-Dade or Monroe County if the relocation has resulted in the dislocation of any employee from the previous community until the employer has been in business in Miami-Dade or Monroe County on a minimum of 120 days.¹⁷
6. Agreements shall not be entered into with employers who have exhibited a pattern of failing to provide OJT participants with continued long-term employment.
7. OJT agreements may not be used to train individuals in occupations where the job seeker works from home.
8. Participants in OJT shall not be employed in the construction, operation, or maintenance of any facility that is used for sectarian instruction or as a place of worship.¹⁸
9. Temporary employment agencies, employment agencies, or employee leasing agencies may not serve as the employer of record for purposes of providing OJT.¹⁹

¹⁶ LOCAL: SFWIB Training Master Plan

¹⁷ FEDERAL: Public Law 105-220, WIA 1998, Sec. 181 (d) (2)

¹⁸ FEDERAL: Public Law 105-220, WIA 1998, Sec. 188 (a) (3); 29 CFR 37.6 (f)

¹⁹ LOCAL: Although allowed by 20 CFR 627.240 (k) (2), the SFWIB chooses to restrict this option.

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6.

SFWIB – Workforce Systems Improvement (WSI) Committee

April 16, 2009

Recommendation as to Approval to Authorize Staff to Draft and Release a Request for Proposals (RFPs) for Work Readiness Services

RECOMMENDATION

SFWIB staff recommends the approval to authorize staff to draft and release a Request for Proposals for Work Readiness Services as set forth below.

BACKGROUND

SFWIB staff has determined that jobseekers benefit from an inclusion of work readiness training programs. Work Readiness training programs generally focus on developing a good work ethic within our jobseeker customers. This training includes, but is not limited to; professional attire, resume preparation, interviewing skills, job search methods, punctuality, attendance, interpersonal skills, etc.

In order to expand the Region’s ability to provide work readiness services to SFWIB customers throughout Miami-Dade and Monroe Counties, SFWIB will request to strategically locate these services in targeted areas.

SFWIB staff recommends the approval to authorize staff to draft and release a Request for Proposals for Work Readiness Services.



7.

SFWIB – Workforce Systems Improvement (WSI) Committee

April 16, 2009

Reallocation of Miami-Dade County Department of Human Services Refugee Employment and Training (RET) Funds

RECOMMENDATION

SFWIB staff recommends the approval of the reallocation of the Miami-Dade County Department of Human Services (MDC/DHS) RET caseload and funds, as set forth below.

BACKGROUND

On January 15, 2009, Miami-Dade County Department of Human Services (MDC/DHS) voluntarily ended their Refugee Employment and Training (RET) contract with SFWIB.

There is currently \$970,379 available to be reallocated from this contract.

In order to serve their RET customers in the South Dade area, SFWIB staff met with all the RET Service Providers identify Service Providers willing to serve RET customers in the South Dade area and to accept the additional cases from MDC/DHS. The following four RET Service Providers expressed their willingness to serve the RET customers in the South Dade area and to accept the MDC/DHS cases: Adults Mankind Organization, Inc, Lutheran Services Florida, Inc, Youth Co-Op, Inc and SFWIB.

In addition, the remaining MDC/DHS customers in Miami-Dade County will be assigned by proximity to the nearest RET Service Provider.

The Table below details the MDC/DHS RET reallocation of their caseload and funds.

RET Service Provider	MDC/DHS RET Caseload Reallocations	MDC/DHS RET Funding Reallocations
Adults Mankind Organization, Inc. (AMOR)	157	\$ 223,714.00
Arbor E&T, LLC	9	\$ 12,824.00
City of Hialeah	6	\$ 7,820.00
Community Coalition, Inc.	19	\$ 27,074.00
Cuban American National Council, Inc.	16	\$ 22,799.00
Lutheran Services Florida, Inc.	157	\$ 223,714.00
South Florida Workforce Investment Board	157	\$ 224,445.00
UNIDAD of Miami Beach, Inc.	3	\$ 4,275.00
Youth Co-Op, Inc.	157	\$ 223,714.00
Totals	681	\$ 970,379.00