



Broward Workforce Development Board
Audit Committee
Monday March 13, 2017
10:30 a.m. – 11:45 a.m.

Call In Number: (888) 670-3525
Passcode: 1907967713#

A G E N D A

CareerSource Broward (CSBD)

Illumination Conference Room, 2550 W. Oakland Park Blvd., Fort Lauderdale, Florida 33311

The Committee is reminded of conflict of interest provisions. In declaring a conflict, please refrain from voting or discussion and declare the following information: 1) Your name and position on the Board, 2) the nature of the conflict and 3) who will gain or lose as a result of the conflict. Please also fill out form 8B prior to the meeting.

SELF-INTRODUCTIONS

APPROVAL OF MINUTES

Approval of the Minutes of the February 13, 2017 Audit Committee Meeting.

RECOMM Approval

ACTION Motion for Approval

EXHIBIT Minutes of the February 13, 2017 Meeting

Pages 4

NEW BUSINESS

1. General Fund Balance

CSBD deposits the revenue earned during the year in its Citibank Money Market account. We move the funds from Citibank to the General Fund deposited with the State Board of Administration (SBA) twice a year. Since the beginning of the program year at July 1, 2016, we have realized additional revenue of \$276,801. As of January 31, 2017 the current General Fund balance is \$1,474,727. This amount is after making the down payment on the Building.

RECOMM Approval

ACTION Motion for Approval

EXHIBIT Memo #06-16 (FS)

Pages 5-6

2. Budget v Expenditures Report July 1, 2016 through January 31, 2017

The Budget v Expenditure Report is presented in accordance with previous BWDB Chair Mr. Horkey's request for the period July 1, 2016 through January 31, 2017.

RECOMM Approval
ACTION Motion for Approval
EXHIBIT Memo #05-16 (FS)

Pages 7-8

REPORTS

1. Program Year 2015-2016 State Financial Compliance Monitoring Report

The 2015-2016 Financial Compliance Monitoring Report for CSBD was performed by the state monitors on October 25, 2016. There were no findings and 2 observations which have been corrected.

RECOMM Approval
ACTION Motion for Approval
EXHIBIT Memo #12-16, (LS)

Pages 9-10

2. Taylor, Lombardi, Hall and Wydra (TLHW) Fiscal Monitoring Reports Program Year 2015/2016

TLHW conducted two fiscal monitorings, one for the period November 15, 2015 through April 15, 2016 and one for the period April 15, 2016 through July 31, 2016. During this time there were a number of findings related to proper charging of indirect costs, cost allocation, reconciliation of accounts and misclassifications. These findings occurred during the time there were vacancies in key positions in the Finance Department. The new VP of Finance, appointed in September, addressed all the findings and made the appropriate adjustments to the CSBD ledgers prior to the start of the annual audit.

RECOMM Approval
ACTION Motion for Approval
EXHIBIT Memo #07-16 (QA)

Pages 11-19

3. TLHW Fiscal Monitoring Report July 31 through October 31, 2016

TLHW conducted fiscal monitoring for the period July 31, 2016 through October 31, 2016. There were six (6) findings and eight (8) observations. Some of these findings relate back to the period prior to the appointment of the VP of Finance. All findings and observations have been corrected.

RECOMM Approval
ACTION Motion for Approval
EXHIBIT Memo #08-16 (QA)

Pages 20-25

4. TLHW Program Monitoring Report February 1 through August 4, 2016

TLHW conducted program monitoring for the period February 1, 2016 through August 4, 2016. There were 17 findings and 27 observations. All findings and observations were corrected except where welfare cases were closed and no further action could be taken.

RECOMM Approval
ACTION Motion for Approval
EXHIBIT Memo #06-16 (QA)

Pages 26-36

MATTERS FROM THE AUDIT COMMITTEE

MATTERS FROM THE FLOOR

MATTERS FROM THE PRESIDENT/CEO

ADJOURNMENT



MINUTES

CareerSource Broward
Illumination Conference Room, 2550 West Oakland Park Boulevard, Fort Lauderdale,
FL 33311

The Committee is reminded of conflict of interest provisions. In declaring a conflict please refrain from voting or discussion and declare the following information: 1) Your name and position on the Board, 2) the nature of the conflict and 3) who will gain or lose as a result of the conflict. Please also fill out form 8B prior to the meeting.

SELF-INTRODUCTIONS

ATTENDEE: Michael Carn, Ben Chen and Marjorie Walters. Frank Horkey and Gary Arenson attended via teleconference

STAFF: Mason Jackson, Carol Hylton, Rochelle Daniels, Jennifer Pugh and Vicky Underwood were present.

1. APPROVAL OF MINUTES

Approval of the Minutes of the August 26, 2016 Audit Committee meeting.

On a motion by Frank Horkey and seconded by Ben Chen, the Audit Committee unanimously approved the minutes of the August 26, 2016 Audit Committee meeting.

NEW BUSINESS

Grau & Associates has completed its Audit Report for the 2015 – 2016 CareerSource Broward (CSBD) fiscal year. The report contained no findings.

On a motion by Frank Horkey and seconded by Gary Arenson, the Audit Committee unanimously approved the Audit Report for the 2015-2016 CSBD fiscal year.

MATTERS FROM THE AUDIT COMMITTEE: NONE

MATTERS FROM THE FLOOR: NONE

MATTERS FROM THE PRESIDENT/CEO: NONE

ADJOURNMENT: 11:40 a.m.

Memorandum #06-16 (FS)

To: Audit Committee
From: Mason Jackson, President/CEO
Subject: General Fund Balance
Date: March 9, 2017

SUMMARY

CareerSource Broward (CSBD) deposits the revenue earned during the year in its Citibank Money Market account. We move the funds from Citibank to the General Fund deposited with the State Board of Administration (SBA) twice a year. Since the beginning of the program year at July 1, 2016, we have realized additional revenue of \$276,801. As of January 31, 2017 the current General Fund balance is \$1,474,727.

BACKGROUND

We realize revenue from our Ticket to Work (TTW), Tobacco Free Florida, and Department of Vocational Rehabilitation initiatives, Board member donations, and interest earned on the funds in the SBA and Citibank money market accounts. When unrestricted revenue is earned we first deposit it into the Citi Money Market account. We make transfers into the SBA twice a year paying our bills from the Citi account because of the complicated withdrawal process from the SBA.

DISCUSSION

On July 1, 2016 there was \$1,951,957 in the General Fund. Since July 1, 2016, General Fund revenues total \$276,801 as depicted in the chart below:

Revenues	
Board Retreat Donations	\$580
Ice Cream Social Donations	\$395
Interest - SBA	\$7,358
Interest - Citibank Money Market	\$75
Tobacco Free Florida Revenue	\$338
Department of Vocational Rehabilitation Revenue	\$6,531
Ticket To Work (TTW) Revenue	\$261,524
Total	\$276,801

The chart below shows our General Fund expenditures since the beginning of the program year at July 1, 2016:

Expenditures	
Food purchases for board and committee meetings including planning session and networking events where food is served	\$4,281
TTW salaries and expenditures ¹	\$90,349
New Building Down Payment (July 2016)	\$145,000
New Building Closing (October 2016)	\$514,401
Total	\$754,031

The funds for the building purchase were paid from the Citi account because there were sufficient funds in the account. Authorization documents are needed to make transfers to the SBA, and they were only perfected recently. As a result there was enough money to cover the down payment in the Citi account.

The General Fund is invested as follows:

	Balance 1/31/17
State Board of Administration	\$1,523,654

The interest earned in the SBA account is deposited directly into the account and recorded in the General Fund each month.

RECOMMENDATION

None. For information purposes.

¹ We began charging the General Fund for the TTW staff in October 2015 following governing boards' approval.

Memorandum #05 – 16 (FS)

To: Audit Committee

From: Mason Jackson, President/CEO

Subject: Budget vs. Expenditure Report

Date: March 1, 2017

SUMMARY

Detailed below is the Budget for Program Year 2016-17 vs. Expenditures covering the period July 1, 2016 through January 31, 2017. This includes all funds available to date. February's expenditures will not close until March 20th. The date of this report represents expenditures at 58% of the program year. A detailed chart is provided which offers a comparison of the budget to actual expenditures by funding stream followed by the actions taken to bring the expenditures and budget into alignment and we are on target.

BACKGROUND

This report is presented in accordance with past BWDB Chair Mr. Horkey's request for updates regarding the budget as compared to actual expenditures. The committee is reminded that expenditure fluctuations occur as a result of invoice requests for contracts, OJTs, ITAs, and support services being submitted at different times.

DISCUSSION

This report is for PY 16-17, which captures expenditures from the start of the program year on July 1, 2016 through January 31, 2017 and budget availability to date. Because fiscal closes its books on the 20th of each month for the previous month, February expenditures are not included in this report.

This report compares our budget to expenditures by funding stream. The date of this report represents expenditures at 58% of the program year. A detailed chart begins on the next page:

Budget vs. Actual

Funding Stream	PY16/17 Budget	Expenditures 7/1/16 – 1/31/17	% Expended	Notes
Workforce Innovation and Opportunity Act (WIOA)				
Dislocated Worker (DW)	\$5,320,878	\$1,848,218	35%	1
Adult	4,708,020	2,858,481	61%	
Youth	4,994,188	2,432,432	49%	2
Welfare Transition (WTP)	4,371,164	2,242,814	51%	
Wagner Peyser	544,062	322,174	59%	
SNAP	711,092	453,503	64%	3
Veterans	170,419	72,663	43%	4
Unemployment Compensation	160,708	107,171	67%	5
Total	\$20,980,531	\$10,337,456	49%	

1. We are under spent in DW because of the JD NEG and SP NEG discretionary grants to serve the long term unemployed who are all registered as DW and can receive services similar to those under our formula grants. By using the discretionary grant funds first, we can transfer more DW funds into the adult program where it is needed the most. We expend the discretionary grants first because they are limited to the grant period, which ends June 30, 2017.
2. Youth – we are only slightly underspent in youth, we expect expenditures to increase as the year ends, however although we do not plan for carryforward, CSC is requesting additional funding for P3 and as our funds are committed any additional carryforward would help in providing the additional funds needed for the P3 pilot.
3. We expect SNAP expenditures to level out by the end of the year. We were aware of the over expenditure however the state indicated additional funds were available. We were reluctant to reduce expenditures while we believed the state would provide additional funds as SNAP became mandatory this year. We requested the funds but we didn't receive the amount requested. Since January staff has been reduced by 2.75 FTEs which also reduces the SNAP share of one-stop costs and overhead.
4. DEO awarded CSBD \$61,000 in additional pass-through funds in early February which funds were accepted at the One Stop committee meeting on March 7, 2017 increasing the total available.
5. WIOA mandates that we provide UC assistance in the one-stop. Rather than reduce staff to bring down expenditures we will reassign UC staff for a part of the day and will deploy them to assist in the WTP or WIOA programs for one quarter through the end of June 2017. We have re-assigned all non-state staff working on UC so we are also able to reallocate their costs and related overhead to the other funding streams.

RECOMMENDATION

None. For information purposes only.

Memorandum #12-16, Legal

To: Mason Jackson, President/CEO
From: Rochelle J. Daniels, General Counsel
Subject: State 2015-2016 Financial Compliance Monitoring Report
Date: March 1, 2017

SUMMARY

The State's 2015-16 Financial Monitoring report was issued on November 9, 2016 after their 2nd bi-annual desk review in October 2016. There were no findings and 2 observations which have been corrected.

BACKGROUND

For PY 2015-2016, the State performed two bi-annual fiscal monitorings, an onsite and a desk review.

DISCUSSION

The State financial monitoring was conducted by the DEO's Bureau of Financial Monitoring and Accountability (FMA) and the review covered the period July 1, 2015, through June 30, 2016.

For the 1st Bi-Annual review, the State performed an onsite review on March 28-31, 2016. For the 2nd Bi-Annual review, the State performed a desk review. CSBD received the report on November 9, 2016.

There were no findings. There were two observations.

CareerSource Broward (CSBD) Observation Details – 2015-2016 DEO Fiscal Review				
CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Observation #1 Implementation of the Uniform Guidance Regulations	Changes are needed throughout the financial management policies and other organizational policies to ensure compliance with the Uniform Guidance, 2 CFR, Part 200.	CSBD Finance should update all financial policies to ensure compliance.	Agree	Updates to the financial management policies and other organizational policies were in process at the time of monitoring. They are now updated.

CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Observation #2 Purchasing <i>Score at the Top</i>	A Purchase Requisition was not used for one purchase, per CSBD Policy #302 - Purchase Requisition Procedures.	CSCD Finance staff should ensure there is a properly completed and authorized Purchase Requisition for all purchases.	Agree	This Purchase Requisition was approved by the VP of Operations in an email. There are circumstances when a Purchase Requisition is not required. CSBD is updating our Purchasing Policy #302 to reflect this.

RECOMMENDATION

None. Presented for informational purposes.



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Ft. Lauderdale, Florida 33309

Memorandum #07 – 16 (QA)

To: Audit Committee

From: Mason Jackson, President/CEO

Subject: Results of the Taylor, Lombardi, Hall and Wydra, (TLHW) PA Fiscal Monitoring Reports #2 and #3 – PY 15-16 – April and July 2016

Date: March 2, 2017

SUMMARY

TLHW conducted two fiscal monitorings, one for the period November 15, 2015 through April 15, 2016 and one for the period April 15, 2016 through July 31, 2016. For the April 2016 review, there were eleven (11) findings and eight (8) observations. For the July 2016 review, there were fifteen (15) findings and five (5) observations. We have grouped the two reports under this one memo because the type of findings were similar mostly attributable to the indirect cost rate and cost allocation. These findings occurred during the period that CSBD was searching for a new VP of Finance and an Accountant. These positions have been filled and the findings have all been corrected.

BACKGROUND

TLHW monitors fiscal activities three times a year. These were the second and third monitorings for the program year. They occurred during the time that CSBD was searching for a VP of Finance and an Accountant, the 1 and 2 positions in the Fiscal Department. The staff in Fiscal were instructed to maintain operations (“keep the ship afloat”) until the positions were filled. During this time we were implementing the new indirect cost rate allocations which is where many of the findings in the report originated. There are many ways to calculate the indirect cost rate. While we did hire temporary help through Robert Half and sought assistance from one of the other boards, it was not until the new VP of Finance came on board that we were able to correct these issues.

DISCUSSION

For the April 2016 review, TLHW reviewed a total of 662 elements during the review period. Based upon the total elements reviewed, the report cites to eleven (11) findings equating to an approximate error rate of 1.66%.

For the July 2016 review, TLHW reviewed a total of 675 elements during the review period. Based upon the total elements reviewed, the report cites to fifteen (15) findings equating to an approximate error rate of 2.22%.

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – April 2016				
CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
Finding #1 Budget Process Review	The indirect costs were being incorrectly calculated and the May MFR was incorrect.	Suggested changes to the Financial Reports were provided to staff.	Agree	The May MFR information was corrected for the audit by the new VP of Finance. We did not go back to correct the NFR because there was no reason to, once the books were corrected.
Finding #2 Small Purchases	The payment for the renewal of the Qualtrics survey software annual license referred to a Procurement Action Form dated 5/8/13.	CSBD should review the purchase and take action as determined appropriate.	Agree	This was an isolated incident.
Finding #3-4 Cost Allocation/ Indirect Cost Rate February 2016	<u>Wagner Peyser (Fund 077):</u> This fund had a negative YTD balance for Modified Total Direct Costs (MTDC) when Equipment and Building Rent were excluded, and a credit (negative) was recorded as an indirect cost under Wagner Peyser (WP).	CSBD should review and take action to ensure that costs are posted to the appropriate fund, directly allocable cost pool or indirect cost pool.	Agree	The new VP Finance addressed these issues and corrected them. Equipment Rent and Building Rent are separated from the program cost pool and will no longer be combined with other expenses and allocated to funds utilizing the Overhead Expense classification.
Finding #5-6 Cost Allocation/ Indirect Cost Rate	The general fund (Fund 002) was not included in the indirect cost recovery calculation.	CSBD should review and take action to ensure costs are posted to the appropriate fund.	Agree	

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – April 2016

CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
<p>Finding #7-8 OSMIS Reporting</p> <p>February 2016</p>	<p>a) For the <u>WIOA Adult FRS</u>, total expenditures reported by cost category (i.e., Career Services and Training) did not agree with supporting schedules. Additionally, the stand-alone cost categories for ITA-Federal and ITA-State expenditures did not agree with the general ledger and supporting schedules.</p> <p>b) For the <u>WIOA Youth FRS</u>, total expenditures reported by cost category (i.e., In-School Youth and Out-of-School Youth) did not agree with supporting schedules. Additionally, the stand-alone cost category work experience expenditures did not agree with the general ledger and supporting schedules.</p>	<p>During fieldwork, TLHW provided training on OSMIS cost categories and the Excel template utilized to aid in the reporting process to staff now tasked with reporting grant expenditures in OSMIS. At that time, corrections were made to reporting spreadsheets and the adjustments required to correct the cost category totals in OSMIS when reporting March 2016 expenditures were discussed.</p>	<p>Agree</p>	<ul style="list-style-type: none"> • Corrections were made to reporting spreadsheets while TLHW was onsite. • Adjustments required to correct the cost category totals in OSMIS were completed when March 2016 expenditures were reported. • Going forward, Fiscal staff will review each FRS report to ensure OSMIS reflects the correct year-to-date cost category totals.
<p>Finding #9-10 EmpHire – Payroll Costs</p> <p>March 15, 2016 invoice</p>	<p>a) Time/payroll costs for “cost allocate” staff are being allocated to WIOA Adult and DW Training for capturing costs under the training cost category of ITA State (50%); however, only actual time for this cost category should be charged by staff, and these staff do not likely work with customers in training activities.</p> <p>b) For the South Center, it appears that the “cost allocate” percentages utilized for payroll distributions have WIOA Adult Training and WIOA DW Training percentages transposed for all applicable staff.</p>	<p>CSBD should review EmpHire invoices to-date to ensure only appropriate payroll costs are being classified under the training cost category of ITA State (50%) and costs are properly reported between WIOA Adult and Dislocated Worker. Corrections to costs reported should be made as determined necessary.</p>	<p>Agree</p>	<p>These items were corrected. Going forward, Fiscal staff will review EmpHire invoices to ensure only appropriate payroll costs are being classified under the training cost category of ITA State (50%) and costs are properly reported between WIOA Adult and Dislocated Worker.</p>

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – April 2016

CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
<p>Finding #11 EmpHire – Payroll Costs</p> <p>March 15, 2016 invoice</p>	The EmpHire payroll service fee was incorrectly allocated	CSBD should review EmpHire invoices to ensure costs are properly reported between WIOA Adult and Dislocated Worker.	Agree	These items were corrected. This happened during a period of transition in the Finance Department

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – April 2016

CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Budget Review Process	There was expense classification errors in some of the numbers reported on the Monthly Financial Statements.	Specifics were provided to staff during fieldwork. We suggest these changes be made to the Monthly Financial Reports.	Agree	Postings were reviewed and adjusted.
Small Purchases	There were expense misclassifications in the general ledger. A survey software annual license cost was classified to Membership Dues (acct# 51280). Staff training on employer engagement was classified to Business Outreach (acct# 53251).	CSBD Finance staff should review expense codings prior to posting to ensure classifications are appropriate and consistent based on the costs being incurred.	Agree	These concerns were corrected prior to the audit.
Employee Expense Reimbursements	Policy #320 (Travel) requires Google Maps to be used except for travel between centers, and documentation is required to be attached to the expense report. We noted instances whereby Google Maps documentation was not attached to the expense reports. For 1 staff, the DOT map mileage did not agree to the map mileage reported on the expense report.	CSBD staff should follow the procedures as outlined in the travel policy.	Agree	Policy #320 (Travel) was revised in January 2016. Fiscal staff was reminded to review the policy. The involved staff is no longer employed with CSBD.

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – April 2016

CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Credit Card Purchases - February 2016	It appears that some staff are confused about micro-purchases under the new OMB Uniform Requirements, as they are selecting both State contract and micro-purchase as the procurement method on the purchase requisition form.	Procurement training should be provided to staff.	Agree	This has been clarified to staff.
Credit Card Purchases - February 2016	Policy #301 (Purchasing Procedures) requires an employee other than the employee who requested the goods or services to receive the goods or services. We noted one instance for the North Center where the same employee performed both functions.	CSBD staff should follow purchasing procedures as outlined in the policy.	Agree	This was an isolated incident. On 7/20/16, Michael Watson, Sr. Manager of Career Center Services sent an email to remind Center Managers of this requirement.
Cost Allocation/Indirect Cost Rate - February 2016	Costs posted to the indirect cost pool (Fund 005) should be analyzed to ensure only indirect costs are posted to this	N/A	Agree	Specifics were discussed during fieldwork and this was corrected.
OSMIS Reporting - February 2016	For the WIOA Youth FRS, SubDept 85 (ISY WE) and 86 (OSY WE) were created in the general ledger to track work experience-related expenditures, as WIOA requires that 20% of program funds be spent on work experiences, including wages and staff costs for the development and management of work experiences. During our review, we noted expenditures unrelated to work experience posted to these general ledger sub-departments. CareerSource is currently using WIA carryover funds, for which the 20% work experience requirement does not apply; however, when 2015 WIOA funds start to be utilized, the Work Experience cost category will be overstated on the FRS if non-work experience-related expenditures continue to be posted to this SubDept.	Only those work experience costs allowable by WIOA should be recorded in SubDept 85 and 86, to ensure that work experience expenditures are properly reported in OSMIS to DEO.	Agree	<ul style="list-style-type: none"> This was corrected. The OSMIS report was reconciled in April and the corrections were made in OSMIS to reflect the correct classifications. Going forward, the Accounting Manager or designated staff has established a review process to identify the correct grouping and prevent wrong expenses from being included in OSMIS reporting. Informal Fiscal staff training has occurred; a formal, customized staff training should be planned with the assistance of the new Sr. VP of Finance. Fiscal staff need to gain a better understanding of the different categories and expenses related to each category.

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – April 2016

CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
EmpHire - March 15, 2016 invoice	1. A WIOA Success Coach (South) reported time that was identical by day of the week for the two weeks during the pay period sampled. 2. Contract Payment Clerk was charged to the program cost pool; however, the job description indicates that this staff is primarily working on OJT contracts and payments, which would indicate time related to the WIOA cost category of Training Program Management for ITA State (50%) that is not being captured.	CSBD should continue efforts to ensure staff are properly reporting time by fund/activity on timesheets.	Agree	1. This was the actual time as reported by the Success Coach. 2. This was corrected.

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – July 2016

CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
Finding #1 Budget Process	The indirect cost amounts reported on the Monthly Financial Reports do not reflect the actual indirect costs incurred, only those computed utilizing the indirect cost rate. Thus, any variances between the actual indirect cost amounts incurred to those being recaptured utilizing the indirect cost rate are not being reported on the Monthly Financial statements.	Suggested changes to the Financial Reports were provided to staff to incorporate into the indirect cost templates.	Agree	Corrected. Staff is aware of the issues which arose in calculating the indirect cost rate during the time there was turnover in Finance. All issues were resolved prior to the Annual Audit.
Finding #2-7 Cost Allocation/ Indirect Costs June 2016	<ul style="list-style-type: none"> a) The indirect cost recovery worksheet contained formula errors b) Adjustments and funding decisions should be made each month prior to calculating and posting the indirect cost recovery. c) For one journal entry, costs were inappropriately reclassified in the general ledger. d) There were WIOA Youth subaward expenditures that were not considered excluded items for calculating MTDC. e) The WIOA Youth Base Expenditures for MTDC figure inappropriately included an add-back of \$50,000 for two subawards f) There are direct admin costs (payroll-related) charged to WIOA Youth; however, there should not be direct admin costs in this fund subsequent to 9/30/15 with implementation of an indirect cost rate plan. 	CSBD should ensure costs are posted to the appropriate fund.	Agree	

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – July 2016

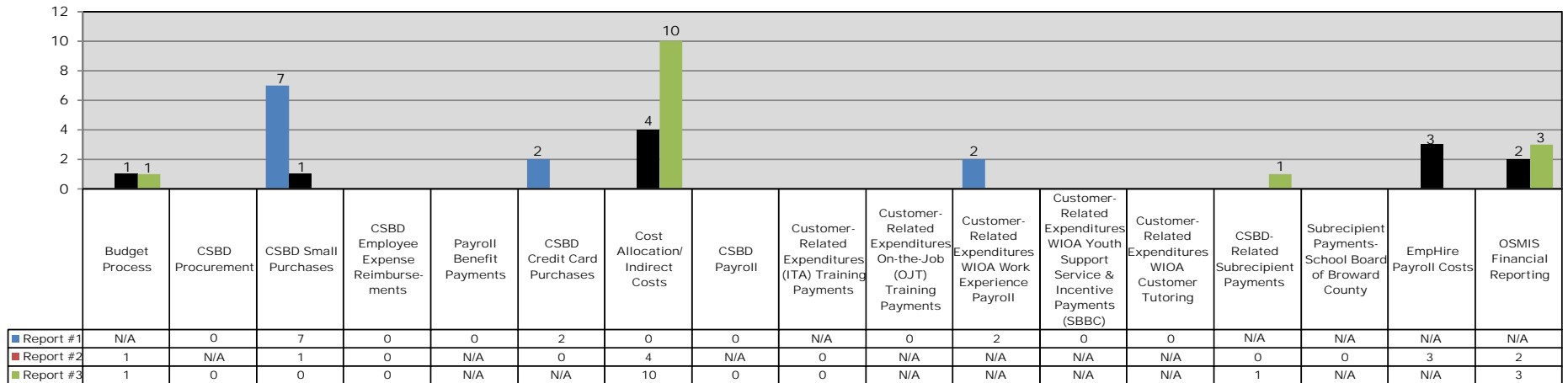
CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
Finding #8-11 Cost Allocation/ Indirect Costs – June 2016 (continued.)	<p>g) One journal entry incorrectly reclassified audit fees, financial monitoring and VP of Finance training from the Indirect Cost Pool to the Program Cost Pool.</p> <p>h) Financial monitoring costs that were administrative were charged to the Program Cost Pool in May 2016, and then subsequently allocated among funds as a direct program cost.</p> <p>i) The Overhead Expense account, which should reflect a zero balance at month-end, has a credit balance. There are no expenses directly posted to this account, and the balance is a result of adjustments.</p> <p>j) The indirect cost recovery for May 2016 was not based on the approved method of applying the approved indirect cost rate to MTDC by fund, and the amount of indirect costs recovered exceeded the allowable amount for the month.</p>	CSBD should ensure costs are posted to the appropriate fund, directly allocable cost pool or indirect cost pool.	Agree	All adjustments were made with the hiring of the new VP of Fiscal and corrected prior to the end of the program year
Finding #12-13 OSMIS Financial Reporting June 2016	<p>For the WIOA Adult OSMIS Financial Report Summaries reviewed:</p> <p>a) Total YTD expenditures per the general ledger exceeded that reported in OSMIS.</p> <p>b) The stand-alone cost category for ITA-State expenditures did not agree with the general ledger.</p>	OSMIS should be corrected to reflect general ledger totals.	Agree	The OSMIS reports were corrected.
Finding #14 OSMIS Financial Reporting June 2016	For the 2015 WIOA Youth OSMIS Financial Report Summary, the amount reported under the stand-alone cost category for Work Experience was overstated due to the inclusion of inappropriate expenses per TEGl 08-15.	Only those work experience costs allowable under WIOA should be recorded in SubDept 85 and 86.	Agree	This was corrected.
Finding #15 Subrecipient Invoices - CSBD	A portion of CSBD's WIOA Youth subrecipients' operating expenses was improperly classified as work experience-related expenditures.	N/A	Agree	This was corrected.

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – July 2016				
CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Cash Management Review	The accounts payable and interfund bank reconciliations for June 2016 have not been reviewed.	The review process is to be performed in a timely manner.	Agree	This was corrected Reconciliations are done monthly but because of the staff turnover in Fiscal some items were set aside until they could be properly executed
Cash Management Review	The bank reconciliations for the staff payroll and participant payroll accounts have not been prepared for the month of June.	Bank reconciliations be prepared as soon as possible.	Agree	
Budget Process Review	The Monthly Financial Reports do not report the total administrative costs percentage.	We suggest staff report the year-to-date administrative costs on the summary page of the Monthly Financial Reports.	Agree	
Budget Process Review	Over-expenditures of the Wagner-Peyser fund, the WIOA Adult and WTP funds.	CSBD staff should review the over-expenditures noted to determine their validity.	Agree	This was corrected.
OSMIS Reporting – June 2016	The June 30, 2016, Financial Report Summaries and supporting documentation had not yet been reviewed by CareerSource staff.	We suggest that the June 2016 financial report to DEO be reviewed as soon as possible. CSBD should ensure that these reports are reviewed in a timely manner.	Agree	This was corrected. This was due to staff turnover in the fiscal department.

RECOMMENDATION

None; Presented for informational purposes.

CareerSource Broward
TLHW Fiscal Findings - PY 15-16



This chart provides a breakdown of program year-to-date findings by category type.

Report #1 covers the period July 1, 2015, through November 15, 2015. TLHW was on-site at CareerSource Broward in November 2015; the (7) Small Purchases findings occurred in a total of (16) small purchases reviewed in which (9) attributes were tested for each purchase, for a total of (144) elements tested; the (2) CSBD Credit Card Purchase findings occurred in a total of (12) credit card purchases reviewed in which (6) attributes were tested for each credit card purchase, for a total of (72) elements tested; and the (2) WIOA Work Experience payroll findings occurred in a total of (25) payroll disbursements reviewed in which (10) attributes were tested for each payroll disbursement, for a total of (250) elements tested.

Report #2 covers the period November 15, 2015, through April 15, 2016. TLHW was on-site at CareerSource Broward in April 2016; the (1) Small Purchase finding occurred in a total of (8) small purchases reviewed in which (9) attributes were tested for each purchase, for a total of (72) elements tested; the (2) OSMIS Financial Reporting findings occurred in a total of (6) reports reviewed in which (4) attributes were tested, for a total of (24) elements tested; and the (3) EmpHire Payroll Costs findings occurred in a total of (20) employee payroll costs reviewed in which (9) attributes were tested, for a total of (180) elements tested.

Report #3 covers the period April 15, 2016, through July 31, 2016. TLHW was on-site at CareerSource Broward in August 2016; there was (1) Budget Process finding; there were (10) Cost Allocation/Indirect Cost findings for June 2016; there were (3) OSMIS Financial Reporting findings that occurred in in a total of (6) OSMIS Financial Report Summaries reviewed in which (4) attributes were tested, for a total of (24) elements tested; and there was (1) Subrecipients CSBD-related finding.

RECOMMENDATION

None. Presented for informational purposes only.

Memorandum #08– 16 (QA)

To: Audit Committee

From: Mason Jackson, President/CEO

Subject: Results of the Taylor, Lombardi, Hall and Wydra, (TLHW) PA
Fiscal Monitoring Report #1 – PY 16-17 – November 2016

Date: March 3, 2017

SUMMARY

TLHW conducted fiscal monitoring for the period July 31, 2016 through October 31, 2016. There were six (6) findings and eight (8) observations. All findings and observations have been corrected.

BACKGROUND

TLHW monitor fiscal activities three times a year. This was the first monitoring for the program year.

DISCUSSION

TLHW reviewed a total of 598 elements during the review period. Based upon the total elements reviewed, the report cites to six (6) findings equating to an approximate error rate of 1.0%.

Some of the findings occurred during a period of turnover in the Senior VP of Finance position. All findings and observations were corrected by the current Senior VP of Finance and resulted in the Grau & Associates Audit for FY 2015-2016, for which there were no reported findings or material weaknesses.

During this monitoring period there were a total of six (6) findings.

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – November 2016

CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
<p>Finding #1 Small Purchases</p> <p>A Graphic Difference, Inc., DBA image360 (EP# 19939)</p>	<p>A purchase of a sign required DEO approval because it was a capital purchase over \$5,000. The asset needs to be capitalized. One of the quotes received was not responsive and CSBD should have gotten a third quote.</p>	<p>CSBD Finance staff should ensure this purchase is properly supported in compliance with local policies and federal requirements.</p>	<p>Agree/ disagree</p>	<p>a) Prior approval from DEO was obtained on 12/14/16; Photos of completed installation and a paid-in-full statement is now included in the vendor file. b) The sign is now capitalized. c) This was an isolated incident d) We do not agree that another quote was required. Under our policy a no-bid is a bid and therefore we had the 2 quotes we needed.</p>
<p>Finding #2 Small Purchases</p> <p>Konica Minolta Business Solutions (EP# 20304)</p>	<p>The cost of a Konica Machine was not properly allocated and should have been charged as an indirect cost.</p>	<p>CSCD Finance staff should review common costs to ensure proper allocation based on the benefit received and reallocate costs utilizing the Board Overhead Distribution as determined appropriate.</p>	<p>Agree</p>	<p>This cost was reallocated as recommended and charged to indirect.</p>
<p>Finding #3 OSMIS Financial Reporting</p> <p>Sept. 2016</p>	<p>For the 2016 WIOA Adult FRS, ITA-State expenditures reported in OSMIS did not agree with the general ledger, as payroll expenditures unrelated to ITAs were reported under the Training Case Management and Training Program Management sub-cost categories.</p>	<p>Year-to-date expenditures reported under the ITA-State cost category and its sub-categories in OSMIS should be corrected to reflect the appropriate expenditure totals.</p>	<p>Agree</p>	<p>All OSMIS corrections have been made.</p>

CareerSource Broward (CSBD) Finding Details – TLHW Fiscal Review – November 2016				
CSBD Financial Review	Finding	Recommendation	Agree / disagree	Resolution
Finding #4 OSMIS Financial Reporting – Sept. 2016	For the 2016 WIOA Adult FRS, incumbent work training expenditures were not reported under the ITA-State and Incumbent Worker Training cost categories in OSMIS.	Expenditures for incumbent worker training should be properly reported in OSMIS under the appropriate cost categories.	Agree	All OSMIS corrections have been made.
Finding #5 OSMIS Financial Reporting – Sept. 2016	For the 2015 WIOA Youth FRS, Work Experience expenditures reported in OSMIS did not agree with the general ledger and supporting schedules.	CSBD Finance staff should prepare a journal entry to reclassify inappropriate costs, and the Work Experience cost category should be corrected in OSMIS to reflect the appropriate total.	Agree	All OSMIS corrections have been made.
Finding #6 OSMIS Financial Reporting – Sept. 2016	Under WIOA Youth, the Statement of Revenue and Expenditures from MIP reflects that Mileage & Travel expenditures were erroneously charged to Admin.	CSBD Finance staff should review the postings of these expenditures and reclassify costs as appropriate.	Agree	All OSMIS corrections have been made.

During this monitoring period there were a total of eight (8) observations.

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – November 2016				
CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Small Purchases	<p>Administrative and programmatic costs are not being classified in a consistent manner when selecting the code for account segments Dept. and Sub Dept.:</p> <ul style="list-style-type: none"> • One cost was posted to the Program Cost Pool (Fund 006) under Dept. 11 (Admin) and SubDept. 20 (Admin); Fund 006 is intended for program costs only. • Another cost was posted to the Indirect Cost Pool (Fund 005) under Dept. 50 (Program) and SubDept 20 (Admin). 	CSBD Finance staff should ensure proper account coding of purchases and that costs are posted to the Program Cost Pool (Fund 006) and Indirect Cost Pool (Fund 005), as well as specific grants, in a consistent manner.	Agree	All of these misclassifications occurred during vacancies in the Fiscal Department and have been corrected.

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – November 2016

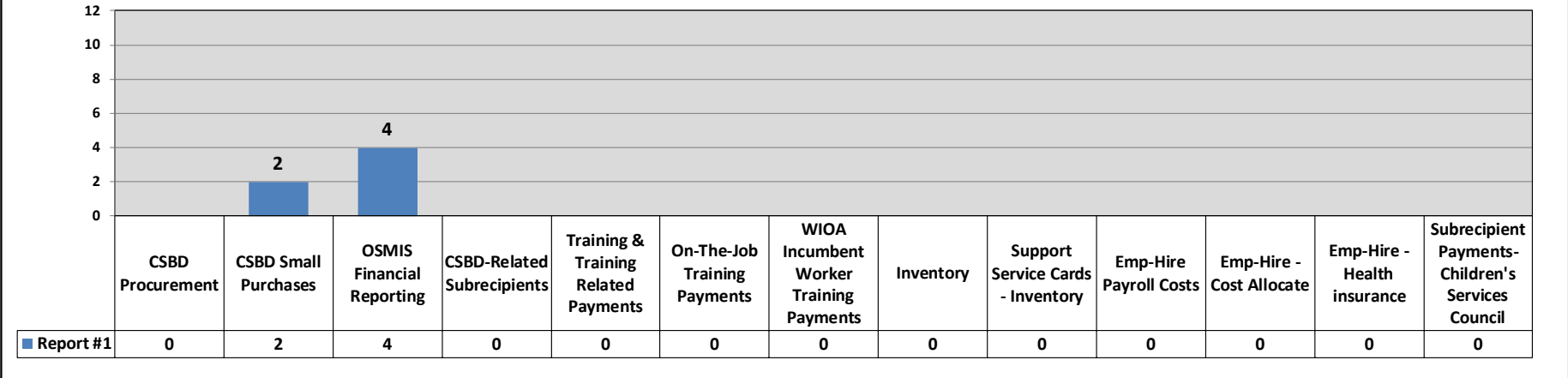
CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
Small Purchases #48258, CDW Government	One purchase requisition provided justification for the need at the North and South locations; however, one of the projectors was allocated based on a Central Distribution without explanation. Changes in use should be specifically identified on the supporting documents to support how costs are to be charged to grants.	CSBD Finance staff should ensure that purchasing supporting documentation includes support for the use and account coding of purchases.	Agree	Supporting documents have been placed in the file.
Small Purchases Dell Marketing, Ck# 19919	The computers purchased for the North center and allocated utilizing a North location distribution were shipped to the Central center; however, this issue and an explanation of the outcome (e.g., computers were moved by IT to the North center for use) was not addressed on the payment supporting documentation.			
EmpHire Oct. 12, 2016 invoice	An invoice was missing from Madison PEO of Florida, Inc. (Firststaff, Inc.) to support the costs billed by EmpHire (invoice# 576) and reconcile with the proof of payment amount (\$336,168.13) submitted with the invoice.	CSBD Finance staff should ensure invoices from Madison PEO of Florida, Inc., are provided with each EmpHire payroll billing.	Agree	EmpHire is currently sending the Madison PEO invoice to CSBD.
EmpHire Oct. 12, 2016 invoice	The payroll fee related to Youth WE staff is being classified as Work Experience (SubDept 86) for cost category reporting purposes although this is not appropriate.	CSBD Finance staff should ensure appropriate payroll costs are being classified under the WIOA training cost category of ITA State (50%) and WIOA Youth cost category of Work Experience; corrections should be made as necessary.	Agree	Sub Departments have been correctly coded. Sub Departments have been correctly coded. USDOL sent out a TEGl recently clarifying how to charge overhead to WE.
EmpHire Oct. 12, 2016 invoice	Benefits related to WIOA training time is being classified as a Support cost (SubDept 81) rather than captured as a Training/ITA cost (SubDept 83) and reported under the 50% ITA Training cost category.		Agree	

CareerSource Broward (CSBD) Observation Details – TLHW Fiscal Review – November 2016				
CSBD Financial Review	Observation	Recommendation	Agree / disagree	Resolution
EmpHire Oct. 12, 2016 invoice	Timesheets for some “Cost Allocate” staff are predetermined based on specific time determinations (e.g., set percentages for some funds or exclusion of some funds) with the remaining percentage allocated to the remaining funds based on the EmpHire Monthly Payroll Allocation percentages. Additionally, support for the time assumptions was not maintained with the supporting templates.	CSBD Finance staff should ensure documentation is maintained to support predetermined distributions for “Cost Allocate” staff to properly substantiate allocation percentages and allow for percentages to be easily verified.	Disagree	Allocations are based on center need to provide necessary services to clients. The allocation is at the discretion of CSBD and could change as various scenarios occur.
Subrecipient Invoices – Children's Services Council (CSC) June 2016 Invoice	Per the cost reimbursement contract, Children's Services Council (CSC) has subcontracted with YMCA of South Florida for case management services. The payment request reviewed contained documentation submitted by YMCA to substantiate the payroll expenditures for the month; however, CSC did not provide proof of payment to YMCA as part of the reimbursement request submitted to CareerSource.	CSC should include proof of payment to YMCA with each invoice submitted to CareerSource.	Agree	CSC provided CSBD with an EFT remittance advice to YMCA and the related bank statement.

RECOMMENDATION

None; Presented for informational purposes.

**CareerSource Broward
TLHW Fiscal Findings - PY 16-17**



This chart provides a breakdown of program year-to-date findings by category type.

Report #1 covers the period July 31, 2016, through October 31, 2016. TLHW was on-site at CareerSource Broward in November 2016; the (2) Small Purchases findings occurred in a total of (8) small purchases reviewed in which (9) attributes were tested for each purchase, for a total of (72) elements tested; and the (4) OSMIS Financial Reporting findings occurred in a total of (6) reports reviewed in which (4) attributes were tested, for a total of (24) elements tested.

RECOMMENDATION

None. Presented for informational purposes only.

Memorandum #06 – 16 (QA)

To: Audit Committee

From: Mason Jackson, President/CEO

Subject: Results of the Taylor, Lombardi, Hall and Wydra (TLHW), PA
Program Monitoring Report #2 – PY 15-16 – August 2016

Date: March 1, 2017

SUMMARY

TLHW conducted program monitoring for the period February 1, 2016 through August 4, 2016. There were 17 findings and 27 observations. All findings and observations were corrected except where welfare cases were closed and no further action could be taken.

BACKGROUND

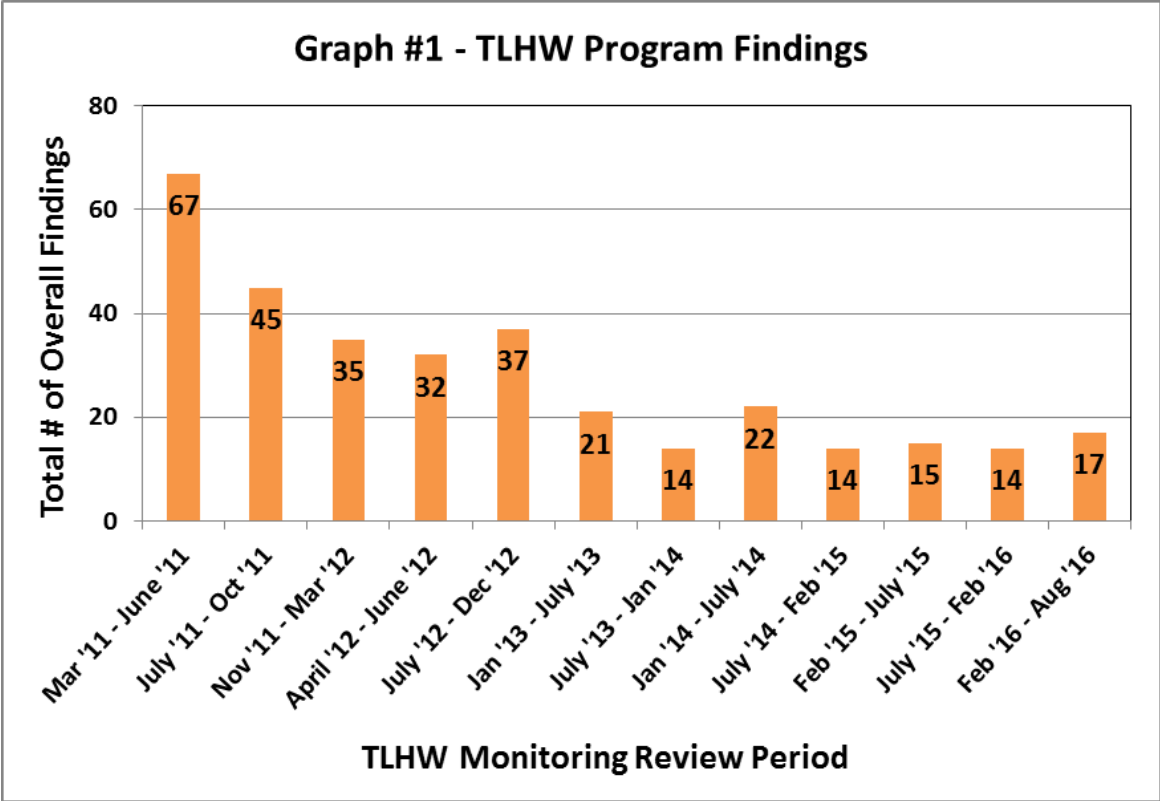
TLHW monitor program activities twice a year. This is their second report for PY 15-16.

DISCUSSION

TLHW identified seventeen 17 findings and 27 observations during their program monitoring visit. They reviewed a total of 198 files consisting of 4,714 elements. The findings equate to an error rate of about .36%.

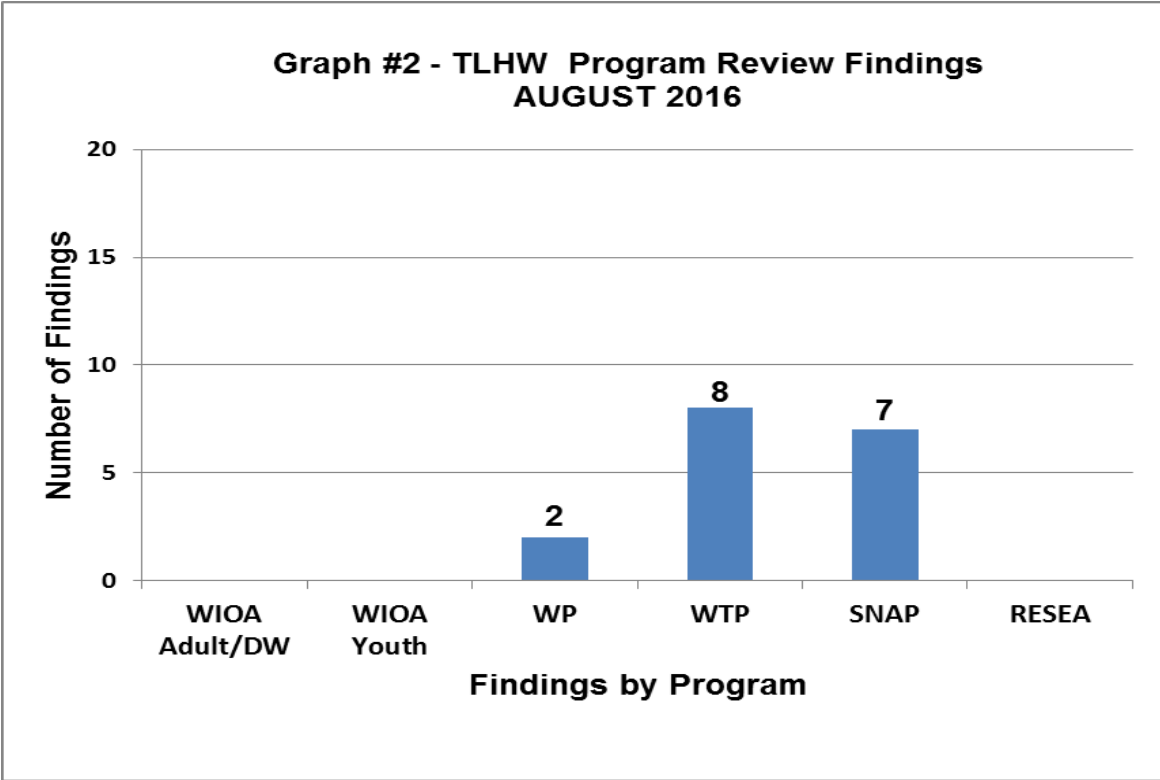
TLHW Program Findings

A trending chart for TLHW program findings per review period since March 2011 is represented in Graph #1 as follows:

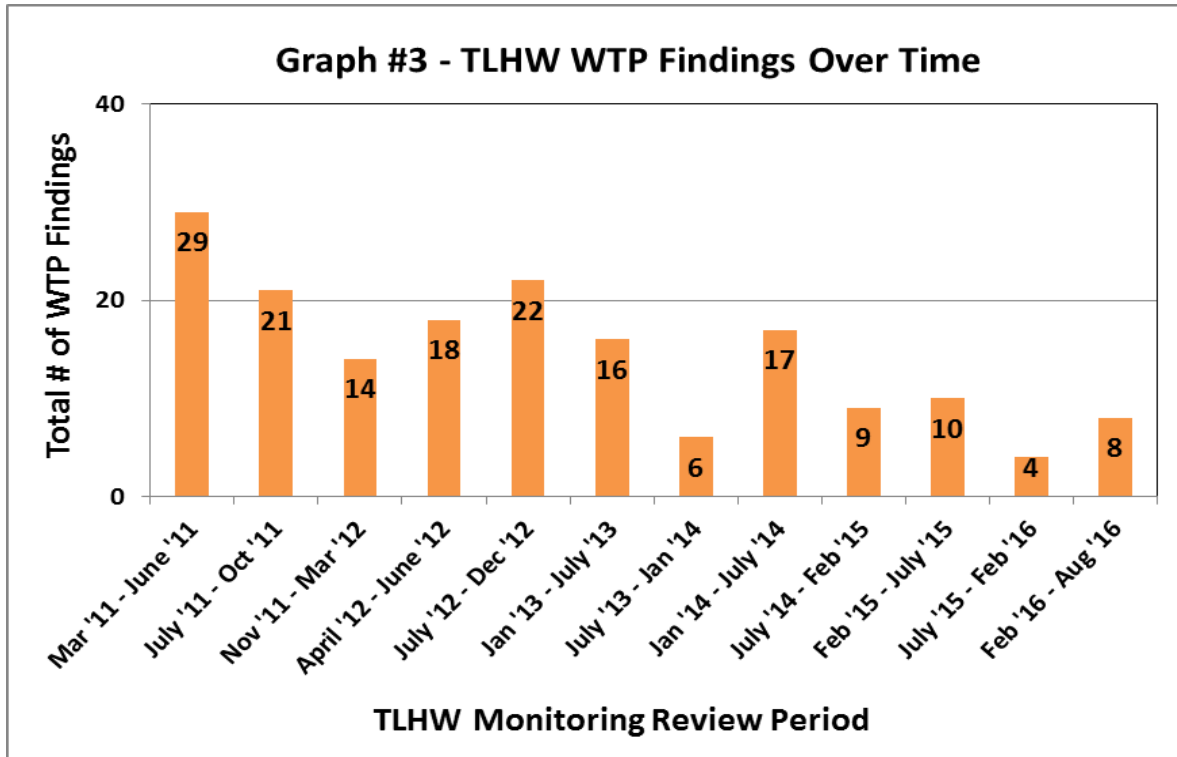


Note: Since 2011, there has been a significant decrease in the overall number of TLHW program findings. The overall error rate for this review period is approximately .36%.

A breakdown of findings by Program is represented in Graph #2 as follows:

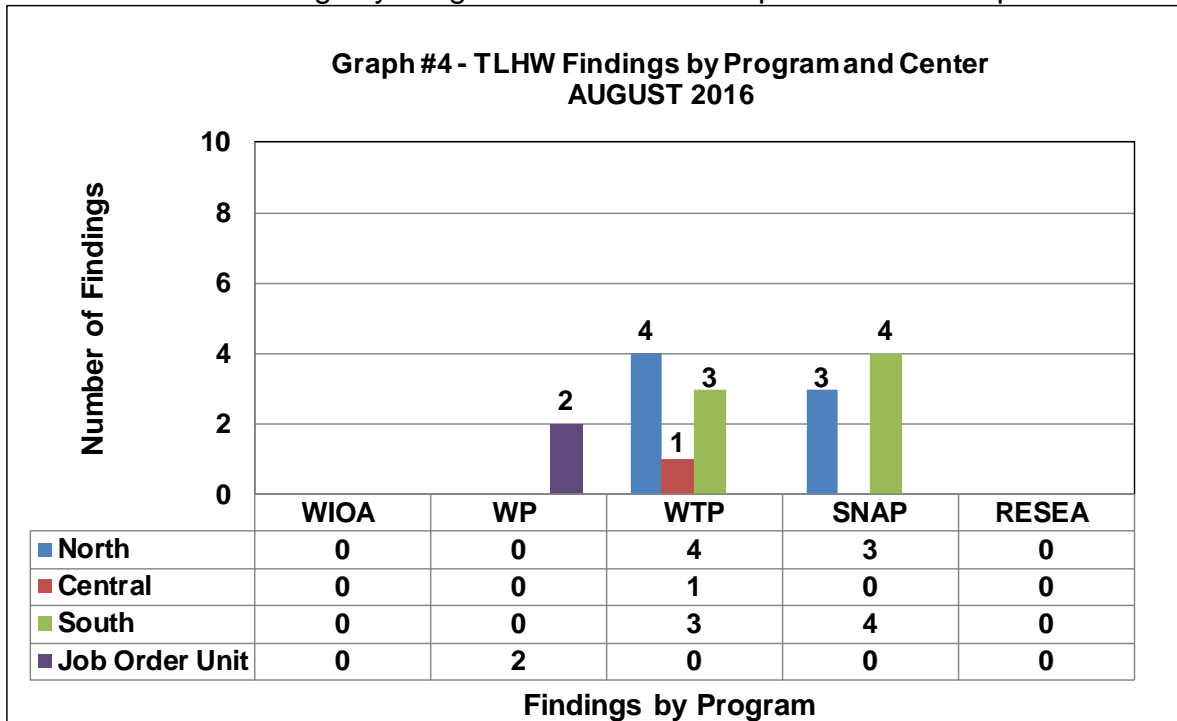


A trending chart for TLHW WTP program findings per review period since March 2011 is represented in Graph #3 as follows:



Note: Since 2011, there has been a significant decrease in the overall number of TLHW WTP program findings. In late May 2016, QA initiated a WTP Quality Improvement Project to help further reduce future WTP findings.

A breakdown of findings by Program and Center is represented in Graph #4 as follows:



TLHW Program Findings for the period of February 2016 – August 2016

The findings and observations in this report were forwarded to the Career Center and Program Managers for resolution and responses. The findings and observations are presented by funding stream along with the corrective action taken.

I. WIOA Adult/Dislocated Worker

- A. 24 WIOA Adult and Dislocated Worker files were reviewed, 8 from each Center. There were no WIOA Adult/Dislocated Worker findings or observations.
- B. 10 WIOA Incumbent Worker Training (IWT) files were reviewed, 6 from Central and 4 from South. There were no WIOA IWT findings or observations.

II. WIOA Youth

24 WIOA Youth files were reviewed; 5 CSBD, 5 FLITE Center, 5 HANDY, 3 SunServe and 6 School Board of Broward County's (SBBC) ICON and CTACE. There were no findings or observations.

III. Wagner-Peyser (WP)

- A. 30 WP files were reviewed, 10 from each Center. There were no findings.

There were 2 WP service documentation observations.

Programmatic Area	Observation	Recommendation	Agree / disagree	Resolution
Observation WP – Service Documentation Review (WP Staff)	The Individual Employment Plan (IEP) did not list specific occupational goals. (North-1, South-1)	Staff should list specific occupational goals on the IEP developed with the customer.	Agree	1) Corrected onsite during fieldwork. 2) On 8/26/16, the Program Manager provided group training to DVOP staff emphasizing required documentation. 3) On 9/6/16, the Program Manager sent an email to involved DVOP staff with the EFM Service Code Guide and 7/14/16 DEO training covering IEP's. 4) The Veterans Program Manager brought in the State Coordinator to train staff on developing goals for IEP's. 5) The Program Manager is working on a CSBD Policy to provide further clarification on the requirements of long term/short term educational/ occupational goals within the IEP.

Programmatic Area	Observation	Recommendation	Agree / disagree	Resolution
Observation WP – Service Documentation Review (WTP Staff)	Some incorrect job development services were recorded by WTP Job Developers (North, Central): a) The name of the employer was not documented. b) Services were recorded for multiple customers on the same day for the same employer. Multiple services were recorded for the same employer for the same customer for different positions.	Job development services recorded by WTP staff should be reviewed to ensure their validity. Also, training should be provided to WTP Job Developers on the requirements of job development services.	Agree	1) Training was provided to the WTP Job Developers emphasizing minimum case note requirements. 2) On 8/2/16 and 9/15/16, the WTP Program Manager emailed the WTP Job Developers a copy of DEO guidance related to this observation; as well as, clarification that although it is possible that multiple services are recorded on the same day for the same customer with the same employer and for different positions, it must be an outlier and not the norm.

B. 30 WP job orders were reviewed, 10 from each Center. There were 2 WP job order findings.

Programmatic Area	Finding	Recommendation	Agree / disagree	Resolution
Findings #1-2 WP Job Orders	The wage rate was not recorded for 2 job orders. (Job Order Unit/JOU-2)	CSBD Job Order Unit (JOU) staff should ensure that wage rate is documented on the job order or case-noted that it meets the Florida minimum wage as required by DEO.	Agree	The Program Manager coached JOU staff, emphasizing that if the wage rate is not listed in the job order, to confirm with the employer that the wage meets FL minimum wage. Once verified with the employer, a case note should be entered on the job order.

There were 3 WP job order observations.

Programmatic Area	Observation	Recommendation	Agree / disagree	Resolution
Observation WP – Job Order Review JO 10266375 JO 10268396	The O*Net code listed on the job order did not match the job order description for 2 job orders. (JOU)	Staff should review job orders for accuracy before posting them into EFM.	Agree	The Program Manager coached JOU staff, emphasizing that: <ul style="list-style-type: none"> a) Staff should read the job description carefully to make sure that an appropriate O*Net code is used for the job order. b) Staff should use the Job Order Desk Aid when completing the 24-hour edit. The Desk Aid contains proper guidance on verbiage to use for the job order. c) Staff should check the employer’s NAICS designation if the job description, job title, or employer’s company name seems to be a staffing agency. If it is a staffing agency, staff should add the verbiage “position offered by no fee staffing agency” in bold lettering at the beginning of the job description.
Observation WP – Job Order Review JO 10266375	One job order contained an inappropriate requirement, “must furnish own tools,” rather than “employer does not provide tools.” (JOU)		Agree	
Observation WP – Job Order Review	One employment agency job order did not list “position offered by no-fee agency.” (JOU)		Agree	

C. 5 WP veteran customers were reviewed. There were no WP veteran findings or observations noted for the review period.

IV. Reemployment Services and Eligibility Assessment (RESEA)

15 RESEA files were reviewed, 5 from each Center. There were no RESEA findings or observations.

V. Welfare Transition Program (WTP)

A. 24 mandatory WTP files were reviewed, 8 from each Center. There were 8 WTP findings.

Programmatic Area	Finding	Recommendation	Agree / disagree	Resolution
Finding #3-5 WTP – File/System Review Assessments	Assessments were not completed within 30 days of referral for 2 customers. (South-2, North-1)	CSBD staff should correct the cases, where possible. Quality Assurance staff should focus on the identified issues when conducting their reviews.	Agree	1) WTP Quality Assurance meeting was held on 8/24/16. The WTP Program Manager provided a detailed presentation, used at both the meeting and during Center level training, to review the TLHW findings and observations. 2) Annual WTP Center level training was held: a) On 8/29/16 and 8/30/16, trainings addressed JPR entry and core requirements. b) On 8/31/16, trainings addressed penalties and sanctions. c) On 9/6/16 and 9/7/16, trainings addressed the IRP and the assessments. 3) WTP Policies #549 and 562 were updated effective 8/23/16.
Finding #6 WTP – File/System Review Assessments	One assessment in OSST did not include the customer's skills and work history. (South-1)			
Finding #7-9 WTP – File/System Review IRP's	Assigned activities were not documented on signed IRPs for 3 customers. (North-2, Central-1)			
Finding #10 WTP – File/System Review Penalties	One customer was not notified of requirements prior to penalty procedures being initiated. (North-1)			

There were 7 WTP observations.

Programmatic Area	Observation	Recommendation	Agree / disagree	Resolution
Observation WTP – File/System Review IRP's	Steps to self-sufficiency contained outdated activity end dates for 3 customers. (North-2, Central-1)	Observations and corrective measures should be reviewed in training and related continuous improvement efforts.	Agree	1) WTP Quality Assurance meeting was held on 8/24/16. The WTP Program Manager provided a detailed presentation, used at both the meeting and during Center level training, to review the TLHW findings and observations. 2) Annual WTP Center level training was held: a) On 8/29/16 and 8/30/16, trainings addressed JPR entry and core requirements. b) On 8/31/16, trainings addressed penalties and sanctions. c) On 9/6/16 and 9/7/16, trainings addressed the IRP and the assessments. 3) WTP Policies #549: WTP Penalties and Sanctioning, and 562: WTP Categories of Participants and Applicable Activities and Services were updated effective 8/23/16.
	Steps to self-sufficiency did not specify 2 customers' responsibilities for participation. (Central-2)		Agree	
	One customer's responsibilities for submitting participation documentation were not specified in the steps to self-sufficiency. (South-1)		Agree	
	Steps to self-sufficiency were not clearly written or updated for 3 customers. (South-2, Central-1)		Agree	
Observation WTP – Case Management	Requisite hours in Core activities were not assigned for 2 customers. (Central-2)		Agree	
	A 30-day follow-up on employment was not recorded on the Follow-up Record in OSST for one customer. (North-1)		Agree	
Observation WTP – Case File Documentation	Medical documentation in one case file specified the medical condition was temporary; however, the duration period was not specified. (North-1)		Agree	

B. 21 transitional WTP files were reviewed, 7 from each Center. There were no transitional WTP findings or observations.

VI. Supplemental Nutritional Assistance Program (SNAP)

15 SNAP files were reviewed, 5 from each Center. There were 7 SNAP findings.

Programmatic Area	Finding	Recommendation	Agree / disagree	Resolution
Finding #11-15 SNAP – File/System Review - Participation & JPR Entries	Documentation in the case file did not support hours recorded on the JPR screen in OSST for at least one month reviewed in 5 cases. (North-1, South-4) The issues noted in South related to the Education activity. Documentation in the case file did not substantiate completion of online Alison education courses and hours counted for participation, or Alison courses were completed that related to job search training and were not countable for the Education activity.	To ensure compliance with this recently-revised program, CSBD should take action to improve SNAP case management, file documentation, and system information. Additionally, consideration should be given to implementing the best practice utilized by the North center for the Education activity that included summarizing the education courses completed and hours counted on the Activity Hours Control Timesheet.	Agree	1) All SNAP Policies, #594, 595 and 596, were revised effective 8/12/16, to improve implementation of the revised SNAP Program. 2) In August 2016, QA initiated a Quality Improvement Project (QIP) for SNAP, outlining countermeasures to help reduce future SNAP findings and improve SNAP case management. 3) On 8/22/16, QA increased SNAP sample sizes for tri-annual QA monitoring. 4) On 10/28/16, the Department of Children and Families (DCF) conducted SNAP training for CSBD SNAP Success Coaches and Supervisors. 5) On an ongoing basis, DCF conducts periodic partnership meetings with CSBD SNAP Supervisors via conference call.
Finding #16-17 SNAP – File/System Review - FSRs	Documentation was missing in the case file to support transportation costs incurred to participate for an FSR issuance in 2 cases. (North-2)		Agree	

There were 15 SNAP observations.

Programmatic Area	Observation	Recommendation	Agree / disagree	Resolution
Observation SNAP– File/System Review - LOP	Policy 595 (FSRs) states Success Coach action for FSR issuances includes "The IQEL, AGPI and IQFS (DCF) screens or the Benefit Information Screen (OSST Screen) is printed and added to the case file;" however, this is not done in practice and, per discussion with management, this requirement should not be in the policy.	We suggest that, in order to ensure continuous improvement for this recently-revised program, SNAP case managers, supervisors and management review the above comments, as well as work papers provided to CareerSource, and take action to improve SNAP case management, file documentation, system information, and local operating procedures.	Agree	1) All SNAP Policies #594, #595 and #596, were revised effective 8/12/16, to improve implementation of the revised SNAP Program. 2) In August 2016, QA initiated a QIP for SNAP, outlining countermeasures to help reduce future SNAP findings and improve SNAP case management. 3) On 8/22/16, QA increased SNAP sample sizes for tri-annual QA monitoring. 4) On 10/28/16, DCF conducted SNAP training for CSBD SNAP Success Coaches and Supervisors. 5) On an ongoing basis, DCF conducts periodic partnership meetings with CSBD SNAP Supervisors via conference call.
Observation SNAP– File/System Review Documentation	The most current Opportunities and Obligations form is not being utilized. (South)		Agree	
	Documentation of scheduled hours each month is not being maintained in the case files. (North, Central, South)		Agree	
	Documentation of scheduled appointments is not being consistently maintained in the case files. (North, Central, and South).		Agree	
	The Work Experience site supervisor signature date on a worksite timesheet was prior to participation in a month. (North).		Agree	
	The Worksite Agreement and Job Description Form in one case file was not signed by CSBD staff. (South-1).		Agree	
Observation SNAP– File/System Review - Case Management	Case notes were not recorded in a timely manner (North, South).		Agree	
	Scheduled appointments could not be determined based on the case notes or case file. (North)		Agree	

Programmatic Area	Observation	Recommendation	Agree / disagree	Resolution
Observation SNAP– File/System Review - Case Management	There was lack of follow-up on scheduled appointments and/or completion of scheduled hours and penalty procedures were not initiated/initiated timely. (North-3, Central-2, South-3)	We suggest that, in order to ensure continuous improvement for this recently-revised program, SNAP case managers, supervisors and management review the above comments, as well as work papers provided to CareerSource, and take action to improve SNAP case management, file documentation, system information, and local operating procedures.	Agree	1) All SNAP Policies #594, #595 and #596, were revised effective 8/12/16, to improve implementation of the revised SNAP Program. 2) In August 2016, QA initiated a QIP for SNAP, outlining countermeasures to help reduce future SNAP findings and improve SNAP case management. 3) On 8/22/16, QA increased SNAP sample sizes for tri-annual QA monitoring. 4) On 10/28/16, DCF conducted SNAP training for CSBD SNAP Success Coaches and Supervisors. 5) On an ongoing basis, DCF conducts periodic partnership meetings with CSBD SNAP Supervisors via conference call.
	Requisite monthly hours (80) were not assigned for the month subsequent to the month of referral (North-1).		Agree	
	The Work Experience activity start date in OSST was prior to the start date of the agreement and actual participation. (South-1)		Agree	
Observation SNAP– File/System Review – JPR Entries	An excessive number of job contacts was documented in one day and counted as participation. (North-1, South-1)		Agree	
	Actual hours of participation in the Education activity were not recorded on the JPR screen in OSST when the participant's total participation exceeded 80 hours in a month, although actual hours should have been recorded for this activity. (South-3)		Agree	
Observation SNAP– File/System Review - Penalty Procedures	Penalties were requested for failure to attend scheduled appointments and/or complete requisite hours in assigned activities; however, documentation was missing in the case file to support that the participant was notified of the requirements. (North-2)		Agree	
	An incorrect failure date was documented on a penalty request. (Central-2)	Agree		

RECOMMENDATION

Presented for informational purposes.