Agenda Section I.

Call to Order
Agenda Section II.

Roll Call
<table>
<thead>
<tr>
<th>Board Member Name</th>
<th>Organization</th>
<th>Attendance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chris Ahrenkiel</td>
<td>Selig Enterprises</td>
<td>P</td>
</tr>
<tr>
<td>Diane Allen</td>
<td>Georgia DOL</td>
<td>E</td>
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<tr>
<td>Charyle Batten</td>
<td>Jackmont Hospitality</td>
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<tr>
<td>Randy Beall</td>
<td>Atlanta &amp; North Georgia Building and Construction Trades Council</td>
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<tr>
<td>Terri Block</td>
<td>Bank of America</td>
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<tr>
<td>Dave Cole</td>
<td>IBM</td>
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<tr>
<td>Leon Goodrum</td>
<td>Goodrum Enterprises, Inc.</td>
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<td>Patricia Horton</td>
<td>Georgia Hospital Association</td>
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<tr>
<td>Nancy Flake Johnson</td>
<td>Urban League of Greater Atlanta</td>
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<td>Mike Kenig</td>
<td>Holder Construction</td>
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<tr>
<td>Eloisa Klementich</td>
<td>Invest Atlanta</td>
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<tr>
<td>Amy Lancaster</td>
<td>Metro Atlanta Chamber</td>
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<tr>
<td>Joseph Lillyblad</td>
<td>GA Power</td>
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<tr>
<td>Kenny Mullins</td>
<td>IBEW</td>
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<tr>
<td>Mary Parker</td>
<td>All N One Security</td>
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<td>Albenny Price</td>
<td>Atlanta Public Schools</td>
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<td>Beverly Riddick</td>
<td>UPS</td>
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<td>Victoria Seals</td>
<td>Atlanta Technical College</td>
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<td>Janelle Williams</td>
<td>Anne E. Casey Foundation</td>
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<tr>
<td>Rashida Winfrey</td>
<td>Mosaic Advisors</td>
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</tbody>
</table>
Agenda Section III.
Adoption of the Agenda
## Regular Meeting

**WorkSource Atlanta Local Workforce Development Board**  
818 Pollard Blvd., SW, Room 240, Atlanta, GA 30315  
**Thursday, November 21, 2019 / 11:00 am – 1:30 pm**

**Nancy Flake Johnson, Acting Chair**  
**Katerina Taylor, Executive Director**

<table>
<thead>
<tr>
<th>Time</th>
<th>Section</th>
<th>Description</th>
<th>Responsible Party</th>
</tr>
</thead>
<tbody>
<tr>
<td>11:00 am</td>
<td>I.</td>
<td>Call to Order</td>
<td>Nancy Flake Johnson, Acting Chair</td>
</tr>
<tr>
<td>11:05 am</td>
<td>II.</td>
<td>Roll Call</td>
<td>Nancy Flake Johnson, Acting Chair</td>
</tr>
<tr>
<td>11:10 am</td>
<td>III.</td>
<td>Adoption of Agenda</td>
<td>Nancy Flake Johnson, Acting Chair</td>
</tr>
<tr>
<td>11:15 am</td>
<td>IV.</td>
<td>Approval of March 14, 2019 Meeting Minutes</td>
<td>Nancy Flake Johnson, Acting Chair</td>
</tr>
<tr>
<td>11:20 am</td>
<td>V.</td>
<td>Public Comment (2 minutes per speaker)</td>
<td></td>
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<tr>
<td>11:30 am</td>
<td>VI.</td>
<td>Welcome Remarks</td>
<td>Katerina Taylor, Executive Director</td>
</tr>
<tr>
<td>11:40 am</td>
<td>VII.</td>
<td>Action Items</td>
<td>Board Chair, Newly Elected</td>
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<tr>
<td></td>
<td></td>
<td>− Election of Board Chair and Vice-Chair</td>
<td>Katerina Taylor, Executive Director</td>
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<td></td>
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<td>− Amend Bylaws (no. of meetings a year)</td>
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<td>− Removal of Board Member (absences)</td>
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<td>− One-Stop Partner MOU/IFA</td>
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<td>− Eligible Training Provider Policy (revised)</td>
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<td>− Participant Medical Records Policy (new)</td>
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<td>− Pick Up Policy (new)</td>
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<td>− Records Retention Policy (revised)</td>
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<td>− Secondary Review Policy (new)</td>
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<td>− Selective Service Policy (revised)</td>
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<td>− Subrecipient Monitoring Policy (new)</td>
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<td>− Approve FY20 Operating Budget</td>
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<tr>
<td>12:40 pm</td>
<td>VIII.</td>
<td>Reports:</td>
<td>Katerina Taylor, Executive Director</td>
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<tr>
<td></td>
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<td>− FY18 Monitoring Findings &amp; Sanction Letter</td>
<td>Buffy Gray, Grants Manager</td>
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<td>− FY20 Budget Update</td>
<td>Tolton Pace, Senior Program Manager</td>
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<td>− TechHire &amp; Homeless Grants Update</td>
<td>Lynn Hamilton, SE Regional Director, ResCare</td>
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<td></td>
<td></td>
<td>− ResCare Adult/Youth Career Services Update/Performance Measures &amp; Targets</td>
<td>Roscell Hall, In the Door, One-Stop Manager</td>
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<td></td>
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<td>− In the Door (One-Stop Operator) Update</td>
<td>Eloisa Klementich, President, Invest Atlanta</td>
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<td>− Contracts Update: ResCare &amp; In the Door, LLC</td>
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<td>− Invest Atlanta Integration</td>
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<tr>
<td>1:30 pm</td>
<td>IX.</td>
<td>Adjournment</td>
<td>Board Chair, Newly Elected</td>
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</tbody>
</table>
Agenda Section IV.

Approval of Meeting Minutes

March 14, 2019
Meeting Minutes
Thursday, March 14, 2019

Board Members Present
(Quorum Present)
Diane Allen, GA Dept. of Labor
Rock Anderson, BedRock Executive Consulting
Terri Block, Bank of America
Dave Cole, IBM
Ann Wilson Cramer, Coxe Curry & Associates
Justin Haight, Georgia Building Trades Academy
Patricia Horton, Georgia Hospital Association
Lolita Browning Jackson, Four Cs Consulting
Nancy A. Flake Johnson, Urban League of Greater Atlanta, Inc.
Mike Kenig, Holder Construction
Cinda Hemdon-King, United Way
Amy Lancaster, Metro Atlanta Chamber
Cory Ruth, Mergence Global
Dr. Victoria Seals, Atlanta Technical College
Aimee Williams, GVRA (represented by Bernadette Allen)
Janelle Williams, Annie E. Casey Foundation

Board Members Absent
Rene Diaz, Diaz Wholesale Foods
Eloisa Klementich, Invest Atlanta
Kenny Mullins, IBEW
Louis Partain, IUPAT
Albenny Price, Atlanta Public Schools
Rashida Winfrey, Mosaic Advisors

WSA Staff
Kimberlyn Daniel, Interim Executive Director
Valerie Carothers, Deputy Director
Jeremie Peterkin, Finance
Karen Simmons, Finance
Tolton Pace, Senior Project Manager
Phyllis Bryant, Chief of Staff
Marc Hannon-White, Business Services Manager
Kristina Garcia-Burfiuel, Policy and Legislative Analyst
I. **Call to Order**
The meeting was called to order by Acting Board Chair Ann Wilson Cramer at 11:02 am.

II. **Roll Call**
Acting Chair Cramer conducted roll call. Board members present and absent are listed above.

III. **Adoption of the Agenda**
Board Member Rock Anderson made a motion to adopt the agenda. The motion was seconded by Board Member Diane Allen. The motion was adopted unanimously by voice vote.

IV. **Approval of Meeting Minutes: September 21, 2018**
Board Member Lolita Browning Jackson noted that the minutes incorrectly stated her employer as Four Cs Consulting. She made a motion to amend the minutes to reflect Comcast as her employer. The motion to amend was seconded by Board Member Patricia Horton. The minutes were amended unanimously by voice vote. A motion was then made by Board Member Horton to approve the minutes as amended. The motion was seconded by Board Member Anderson. The minutes were approved as amended by unanimous voice vote.

**Approval of Meeting Minutes: December 31, 2018**
Board Member Jackson again noted that the minutes should list her employer as Comcast. As well, Board Member Anderson stated that the minutes should reflect his employer as BedRock Executive Consulting. A motion was made by Board Member Jackson to amend the minutes accordingly. The motion to amend was seconded by Board Member Victoria Seals. The minutes were amended unanimously by voice vote. A motion was then made by Board Member Anderson to approve the minutes as amended. The motion was seconded by Board Member Board Member Seals. The minutes were approved as amended by unanimous voice vote.

V. **Welcoming Remarks**
Acting Board Chair Cramer welcomed Board members, staff and guests. She invited Atlanta City Councilmembers Natalyn Archibong, Joyce Sheperd, and Matt Westmoreland to speak. They each gave brief remarks.

VI. **Action Items**

*Action Item #1: Election of Board Officers*
A call for nominations from the floor was made by Acting Board Chair Cramer. None were made. The Acting Chair then presented the following slate as nominees:

- Chair: Ann Wilson Cramer
- Vice-Chair: Rock Anderson
- Treasurer: Nancy Flake Johnson
- Secretary: Terri Block

A motion was made by Acting Board Chair Cramer to approve the nominees as stated. The motion was seconded by Board Member Anderson. The motion was approved by unanimous voice vote.
**Action Item #2: Revisions to 2016-2020 WIOA Regional and Local Plans**
Interim Executive Director Kimberlyn Daniel presented the Regional and Local plan revisions along with a letter from Technical College System of Georgia, Office of Workforce Development granting conditional approval to the revised plans.

Board Member Dave Cole made a motion to approve the revisions. The motion was seconded by Board Member Justin Haight. The motion was approved by unanimous voice vote.

VII. **Reports**

**Business Services** – Valerie Carothers, Deputy Director
- Students2StartUps – This is a program that will place WIOA eligible students in summer internships with tech start ups in the Atlanta area. WorkSource Atlanta is partnering with Invest Atlanta on this program.
- Invest Atlanta Business Services Symposium – WorkSource Atlanta’s Business Services Team hosted On-The-Job Training information sessions at Invest Atlanta on March 6.
- Prospective Companies – The Business Services Team is working with Invest Atlanta to build relationships and provide information to area businesses regarding WIOA services.

**Atlanta Technical College** – Tolton Pace, Senior Project Manager
Progress is being made to spend down the grant awarded to Atlanta Technical College. The Intergovernmental Agreement (IGA) was amended to allow a staffing agency (Dover Staffing) to assist with placement of participants in Work Experience activities. In addition, a marketing contract has been let to better convey to the public the opportunities available through the WSA-ATC program.

**Finance** – Jeremie Peterkin
See Program Expenditure Analysis dated March 8, 2019.

VIII. **Adjournment**
Chair Cramer adjourned the meeting at 12:31 pm.
Agenda Section V.

Public Comment

2 minutes per speaker
Welcome Remarks

Executive Director Katerina Taylor
Agenda Section VII.

Action Item

Election of Board Chair and Vice-Chair
Duties of Board Officers

Chair:
- Must be elected from the business appointees to the Board of Directors.
- Shall serve as Chair of the Board of Directors and as the Chief Executive Officer of AWDA and shall generally supervise, direct, and control the business and the Officers and the Executive Director.
- Shall preside at all meetings of the Board of Directors.
- Shall serve as the Chair of the Executive Committee.
- Shall appoint the members of Standing Committees.
- Shall have such other duties as may be prescribed by the Board of Directors or bylaws.
- May, at the discretion of the Board of Directors, appoint ad hoc committees for special purposes and shall appoint committee chairpersons from among the board.

Vice-Chair:
- Shall act in the absence or disability of the Chair and shall perform all duties of the Chair when so acting.
- Shall have all the powers of the Chair, as appropriate

Secretary:
- Shall keep or cause to be kept:
  - Meeting minutes.
- Shall give, or cause to be given:
  - Notice of all meetings of the Board of Directors.
- Shall have such other powers as prescribed by the Board of Directors or bylaws

Treasurer:
- Shall keep records of all funds and issue reports to the Board of Directors, with the assistance of AWDA’s finance director and staff
- Shall report at each regular meeting on funds received since the last meeting and give copy of such report to the Secretary for inclusion in the meeting minutes.
- If required, shall give the AWDA a bond in the amount and with surety specified by the Board of Directors for faithful performance of her/his duties.
Agenda Section VII.

Action Item

Amend Board Bylaws
A RESOLUTION BY THE WORKSOURCE ATLANTA LOCAL WORKFORCE DEVELOPMENT BOARD TO AMEND ARTICLE VII (“MEETINGS OF BOARD MEMBERS”), SECTION 7.2 (“REGULAR MEETINGS”).

WHEREAS, the State of Georgia has designated the City of Atlanta as Local Workforce Development Area #3 (“LWDA”); and,

WHEREAS, Section 107 of the Workforce Innovation and Opportunity Act (“WIOA”) requires the establishment of a Local Workforce Development Board (“LWDB”) to provide policy guidance and oversight of the workforce development system of the LWDA; and,

WHEREAS, it is the intent and desire of the LWDB to conduct meetings on a quarterly basis during any Program Year (July 1 – June 30); and,

WHEREAS, it is not always feasible for the LWDB to meet on a quarterly basis due to various and sometimes unforeseen circumstances; and,

WHEREAS, to address such circumstances it is recommended that the current LWDB bylaws be amended to allow for meetings to occur four times a year instead of quarterly.

NOW, THEREFORE, BE IT RESOLVED, that Article VII (“Meetings of Board Members”), Section 7.2 (“Regular Meetings”) of the Local Workforce Development Board bylaws shall be amended as follows:

Article VII
Meetings of Board Members

Section 7.2 Regular Meetings.
Regular meetings of the Board shall be held on a quarterly basis four times a year and notice of such meetings will be given at least twenty-four (24) hours in advance of the scheduled meeting, unless unusual circumstances warrant shorter notice.

BE IT FINALLY RESOLVED, that all resolutions or parts of resolutions in conflict herewith are hereby repealed.
Agenda Section VII.

Action Item

Removal of Board Member
WorkSource Atlanta  
Local Workforce Development Board  
Member Attendance

Per Section 6.4(I)(4) (“Tenure on Board”) of WorkSource Atlanta’s Board Bylaws, absence from three (3) consecutive regular meetings or four (4) regular or special meeting absences in any one-year period, except on account of illness or by permission of the Board Chair, shall constitute cause for removal. (adopted on September 22, 2016)

Finding # LWDA 03-2018-19-16: Local Workforce Development Board Review – Non-compliance with Attendance Requirements

Finding/Condition: A LWDB member missed three (3) consecutive meetings without documented cause but remains on the LWDB in violation of attendance requirements.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Notify and remind LWDB members of the mandatory removal requirement for failing to attend three (3) consecutive LWDB meetings without cause;
- Ensure that any LWDB member who has missed three (3) consecutive meetings is formally removed from the LWDB and provide OWD with documentation of removal;
- Ensure that the LWDB appoints a replacement LWDB member, who may be the same individual who was removed, in compliance with the LWDB Bylaw’s nomination and placement provisions;
Agenda Section VII.

Action Item

One-Stop MOU/IFA
# ONE-STOP PARTNERS
## MEMORANDUM OF UNDERSTANDING
### PURSUANT TO THE WORKFORCE INNOVATION AND OPPORTUNITY ACT OF 2014

## I. PARTIES AND PURPOSE

This Memorandum of Understanding ("MOU") is made between the City of Atlanta on behalf of the Atlanta Workforce Development Agency, also known as WorkSource Atlanta ("WSA"), and the following partners, as listed in Column A of the table below (collectively the "Parties"), and sets forth the Parties’ understandings and responsibilities to successfully deliver One-Stop Career Center services pursuant to the Workforce Innovation and Opportunity Act of 2014 ("WIOA"). Other partners, as required by WIOA, that are not represented in Local Workforce Development Area (“LWDA”) #3 will not be included in the MOU at this time.

This MOU is entered into by and between the Parties for the coordination of service delivery and the sharing of infrastructure costs for the comprehensive One-Stop Career Center of Local Workforce Development Area # 3. The Parties to this MOU agree to work collaboratively to carry out the provisions of this MOU.

<table>
<thead>
<tr>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
</tr>
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<tbody>
<tr>
<td>Agency/MOU Partner</td>
<td>WIOA Mandated Program</td>
<td>Program Authorization</td>
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<tr>
<td>WorkSource Atlanta</td>
<td>Adult Employment and Training activities</td>
<td>WIOA Title I-B, Section 131 (Core Program)</td>
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<tr>
<td></td>
<td>Dislocated Worker Employment and Training activities</td>
<td>WIOA Title I-B, Section 131 (Core Program)</td>
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<td></td>
<td>Youth Employment and Training activities</td>
<td>WIOA Title I-B, Section 126 (Core Program)</td>
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<td>YouthBuild</td>
<td>WIOA Title I, Section 171</td>
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<td>Georgia Department of Labor</td>
<td>Employment Services</td>
<td>Wagner-Peyser Act of 1933 (WIOA Title III) (Core Program)</td>
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<td>Trade Adjustment Assistance</td>
<td>Title II of the Trade Act of 1974, as amended</td>
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<td>Jobs for Veterans State Grant program</td>
<td>38 U.S.C. Chapter 34</td>
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<td>State Unemployment Compensation programs</td>
<td>Social Security Act of 1935 (Titles III, IX, XII) and Federal Unemployment Tax Act of 1939</td>
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<td>Atlanta Independent School System</td>
<td>Adult Education and Literacy</td>
<td>WIOA Title II (Core Program)</td>
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<td>Georgia Vocational Rehabilitation Agency</td>
<td>Vocational Rehabilitation</td>
<td>Title I of the Rehabilitation Act of 1973, as amended (WIOA Title IV) (Core Partner)</td>
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<tr>
<td>Fulton-Atlanta Community Action Authority</td>
<td>Employment and Training activities carried out under the Community Services Block Grant</td>
<td>Community Services Block Grant Act (42 U.S.C. 9901)</td>
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<td>The Housing Authority of the City of Atlanta, Georgia</td>
<td>Employment and Training activities carried out by the U.S. Department of Housing and Urban Development</td>
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<td>MTC/Brunswick Job Corps</td>
<td>Job Corps</td>
<td>WIOA Title I, Subtitle C</td>
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<td>AARP Foundation</td>
<td>Senior Community Service Employment program</td>
<td>Title V of the Older Americans Act of 1965</td>
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<td>Re-integration of Offenders programs</td>
<td>Second Chance Act of 2007, Section 212</td>
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<td>N/A</td>
<td>Native American programs</td>
<td>WIOA Title I, Section 166</td>
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<tr>
<td>N/A</td>
<td>Migrant Seasonal Farmworkers programs</td>
<td>WIOA Title I, Section 167</td>
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</table>

II. LEGAL AUTHORITY
The Workforce Innovation and Opportunity Act WIOA Sec. 121(c)(1) requires the Local Workforce Development Board (“LWDB”), with the agreement of the Chief Elected Official (“CEO”), to develop and enter into an MOU between the LWDB and the One-Stop partners, consistent with WIOA Sec. 121(c)(2), concerning the operation of the One-Stop delivery system in a local area.

This requirement is further described in 20 CFR 678.500, 34 CFR 361.500, and 34 CFR 463.500. Additionally, the sharing and allocation of infrastructure costs among One-Stop Partners is governed by WIOA sec. 121(h), its implementing regulations, and the Federal Cost Principles contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR part 200.

III. BACKGROUND INFORMATION

A. The United States Congress authorized the Workforce Innovation and Opportunity Act of 2014 for the purpose of designing a system to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.

B. The purpose/goals of the One-Stop system include: (1) provide quality-focused, employer driven and customer-centered services to meet the needs of workers and employers within the region; (2) align services with regional economic development strategies to meet the needs of local and regional employers by providing a comprehensive, accessible and high quality workforce development system; (3) promote maximum employment opportunities for the job seeker customer; and, (4) develop and promote a well-trained, well educated, highly skilled workforce that
fulfills the needs of the local employer customers and fosters economic development and stability within the region.

C. One-Stop System. At the local level, the comprehensive One-Stop center is a single seamless and accessible site where One-Stop partners integrate services and workforce resources, while providing quality services to job seekers and employers. Comprehensive One-Stop centers provide technological connectivity to partner agencies and programs with a common interface for the public and meet employer demand for a dependable, high quality and properly trained workforce. The One-Stop system in Local Workforce Development Area 3 will serve as the “hub” to connect access points and information centers among the required partners located in the City of Atlanta.

WIOA establishes that in each Local Workforce Development Area, there must exist at least one physically located comprehensive One-Stop Center for service delivery programs under WIOA and partner programs. One-Stop center management staff will: (1) eliminate duplication of common administrative functions and services; (2) manage public funds efficiently; (3) assure team management and quality staff performance in a seamless, integrated environment; (4) provide integrated workforce service delivery through collaboration among partners supported by operational processes, which bring together common services, effective and efficient fiscal/staff resource management and accountability; and, (5) assure customer services are free of cumbersome transitions from one program service to another and there is a smooth customer flow to access the array of services.

III. TERM

A. This MOU and the Infrastructure Funding Agreement (IFA) (See Attachments B and C) shall be effective on July 1, 2019 upon execution by the Partners.

B. The MOU will be reviewed annually, and if no substantial changes have occurred, renewed, not less than once every 3-year period to ensure appropriate funding and delivery of services and to reflect any changes in the signatory official of the Local Workforce Development Board, One-Stop Partners, and/or Chief Local Elected Official. The IFA shall be for a period of one year, reviewed annually, and submitted for approval by all Partners.

C. If, after annual review, the IFA costs charged to the Parties change by five (5) percent or less, the MOU/IFA can be amended without the Parties’ signatures.

D. Any partner who vacates the center or fails to participate in the provisions of the MOU for any other reason than loss of funding will remain responsible for financial costs outlined in the budget in compliance with the cost allocation plan until the end of the current fiscal year.

E. The partners agree to participate in a resolution process with the LWDB prior to terminating this agreement for cause.

IV. OPERATIONS

A. COMMON IDENTIFIER
The One-Stop Center will be required to use a common identifier. The common identifier for the center located at 818 Pollard Boulevard, S.W. Atlanta, Georgia 30315 will be as follows:
B. ONE-STOP OPERATOR RESPONSIBILITIES

A One-Stop Operator selected through a competitive process in accordance with the federal cost principles contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR part 200) will provide the following services:

- Manage daily operations in coordination with the fiscal agent (the City of Atlanta) and WorkSource Atlanta (“WSA”) staff.
- Address and resolve issues relating to growth of partner needs and use of facility space.
- Manage partner responsibilities defined in the One Stop Partner (“OSP”) Memorandum of Understanding (“MOU”).
- Create an integrated and seamless coordination of OSP services through collaborative development of service strategies and resource allocation.
- Coordinate services of required OSP partner agencies.
- Assist in the development and implementation of the required WIOA Memorandum of Understanding with the OSPs as directed by the WorkSource Atlanta Local Workforce Development Board and staff.
- Ensure all required partner services are available to One-Stop Career Center customers.
- Responsible for One-Stop Center certification and compliance.
- Facilitate cross-training among all OSP staff.
- Facilitate sharing of data and information among OSPs and WSA.
- Manage customer access points for OSPs with a virtual presence.
- Ensure the center is staffed 15 minutes prior to the morning hours posted.
- Ensure the center’s doors are open to the public at the hours posted in the morning and closed no earlier than the closing time posted.
- Ensure the facility is clean and in proper condition for public and staff use.
- Monitor partner participation, reporting any required partner absences on their appointed days and times to designated WSA staff.
- Submit all required reports to designated WSA staff.
- Monitor any customer complaints. Handle customer complaints as the event is taking place and report all complaints to the WSA Equal Opportunity (“EO”) Officer.
- Notify designated WSA staff of any needs within the One-Stop Center such as supplies or facility maintenance needs, especially the proper functioning of technology used to provide customer services through partner agencies.
- Develop, with WSA and OSPs, a customer referral system.
- Build relationships among OSPs.
- Work with OSPs on continuous improvement of the comprehensive OSCC delivery system.

V. ACCESS TO SERVICES

Partners will be committed to ensuring high-quality customer service and customer-centered activities. Each partner will make their services accessible through the One-Stop delivery system by following one of the following methods:

A. Having a staff member from the partner program physically present at the One-Stop center, if
required, and appropriately trained to provide information to customers about the programs, services, and activities available; and/or,

B. Referrals to partner services will be made by any one or more of the following methods including but not limited to (all methods will be accompanied by a paper referral):

   1. Video conferencing
   2. Telephone
   3. Partner web-site referrals

These and other possible referrals methods will provide direct access to partners. Making this direct linkage available on-site or through technology to program staff will provide the customer with meaningful information or services.

C. All customers, including those with barriers to employment, will have access to job seeker services at the One-Stop Center. Customers will be referred by one of the methods above to an appropriate partner agency. In some cases, initial eligibility can be determined and information shared with partners.

D. This system design will ensure access and priority for services to individuals with barriers to employment. These may include veterans, those with disabilities, those with lack of transportation, those who need training, and other barriers. Partners will be committed to sharing data and technology to serve customers seeking assistance.

VI. SERVICES REQUIRED THROUGH THE ONE-STOP

A. Career Services.

Career services through the One-Stop network, support and empower customers in making informed decisions based on local and regional economic demand and in achieving their personal employment and education goals (20 CFR 678.430, 34 CFR 361.430, and 34 CFR 463.430). All applicable career services must be made available (i.e., provided) in at least one comprehensive One-Stop Center in each local area. Some or all of the career services may also be available either at affiliated sites or specialized centers.

Career services provide local areas and service providers with flexibility to target services to the needs of the customer. For example, a recently laid off customer may only require local labor market information to prepare for a new job, whereas an entry level worker may need a comprehensive assessment to establish a baseline for determining appropriate training options. There are three types of career services: basic career services; individualized career services; and follow-up career services. The distinction between basic career services and individualized career services is not intended to imply that there is a sequence of services, which was eliminated under WIOA. Rather, the distinction is to clarify that, while basic career services are available to all participants, individualized career services are available to participants after One-Stop Center staff
have determined that such services are required to retain or obtain employment.

B. Basic Career Services (20 CFR 678.430(a), 34 CFR 361.430(a), and 34 CFR 463.430(a))

At a minimum, all of the basic career services described in WIOA secs. 134(c)(2)(A)(i)-(xi), and 20 CFR 678.430(a), 34 CFR 361.430(a), and 34 CFR 463.430(a), must be provided in each local area through the One-Stop delivery system. Basic career services must be made available and, at a minimum, must include the following services:

1. Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs, including co-enrollment among these programs;
2. Outreach, intake (including identification of Unemployment Insurance (UI) claimants likely to exhaust benefits), and orientation to information and other services available through the One-Stop delivery system.
3. Initial assessment of skill levels, including literacy, numeracy, English language proficiency, aptitudes, abilities (including skills gaps), and supportive service needs;
4. Labor exchange services
5. Job search and placement assistance, and, when needed by an individual, career counseling, including the provision of—
   a. information on in-demand industry sectors and occupations;
   b. information on nontraditional employment;
   c. information from career profiles and interest inventories
6. Referrals to, and coordination of activities with, other programs and services and, when appropriate, other workforce development programs;
7. Workforce and labor market employment information, including accurate information relating to local, regional, and national labor market areas, including—
   a. Job vacancy listings in labor market areas;
   b. Information on job skills necessary to obtain the vacant jobs listed;
   c. Information relating to local occupations in-demand; and the earnings, skill requirements, and opportunities for advancement for occupations in demand
8. Provision of performance and program cost information on eligible training providers by program and type of providers and workforce services by program and type of providers;
9. Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area’s American Job Center network;
10. Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including: child care; child support; medical or child health assistance available through the State’s Medicaid program and Children’s Health Insurance Program; benefits under SNAP; assistance through the earned income tax credit; housing counseling and assistance services sponsored through HUD 2; and assistance
under a State program for TANF, and other supportive services and transportation provided through other programs or agencies;

11. Assistance in establishing eligibility for financial aid assistance for training and education programs not provided under WIOA; and

12. Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals seeking assistance in filing a claim—

13. “Meaningful assistance,” as described in Unemployment Insurance Program Letter (UIPL) 20-15 and 20 CFR 678.430, 34 CFR 361.430, and 34 CFR 463.430, means providing assistance as follows:

   a. Only merit staff (State government employees) may, in person at One-Stop centers or remotely, answer questions, provide advice, or make decisions that could affect claimants’ UI eligibility. However, other One-Stop staff may assist in claims by acceptance of information from claimants.

   b. If an individual in a One-Stop center is referred to a telephone for UI claims assistance, it must be a phone line dedicated to serving One-Stop customers in a timely manner. Individuals must not simply be referred to a general information/dial-in line with the state UI agency contact center where the individual is placed into a phone queue along with all other claimants in the State. If the assistance is provided remotely using technology, it must be a technology that enables trained staff to provide the assistance. Examples of technology that enables remote assistance include live Web chat applications, video conference applications, or other similar technology.

   c. The costs associated in providing meaningful assistance may be paid for by the State’s UI program, the WIOA Adult or Dislocated Worker programs, the Wagner-Peyser Act ES, or some combination of these programs.

   d. For purposes of the VR program, basic career services may encompass some of the activities authorized under 34 CFR 361.48(b), which must be provided under an individualized plan for employment for an eligible individual with a disability (e.g., assessments for determining VR needs).

C. Individualized Career Services (20 CFR 678.430(b), 34 CFR 361.430(b), and 34 CFR 463.430(b)) If One-Stop center staff, including designated partner program staff, determine that individualized career services are necessary for an individual to obtain or retain employment, these services must be made available to the individual. These services must be available in all comprehensive One-Stop centers. Center staff may use recent previous assessments by partner programs to determine if individualized career services are needed. Individualized career services include:

1. Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include—

   a. Diagnostic testing and use of other assessment tools; and
b. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;

2. Development individual employment plans, identify employment goals, achievement objectives, and combination of services for participant to achieve employment goals, including the list of, and information about, eligible training providers;

3. Group counseling, which involves two or more participants addressing certain issues, problems, or situations that may be shared by the group members;

4. Individual counseling, which is a one-on-one session that may go into greater detail for a participant regarding certain issues, problems, or situations;

5. Career planning (e.g. case management, WIOA sec. 3(8));

6. Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct services to prepare individuals for employment or training;

7. Internships and work experiences (including transitional jobs) linked to careers;

8. Workforce preparation activities (34 CFR 463.34);

9. Financial literacy services available through the WIOA title I youth program as described in WIOA sec. 129(b)(2)(D) and 20 CFR part 681, including:
   a. Supporting the ability of participants to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals;
   b. Supporting the ability to manage spending, credit and debt effectively;

10. Out-of-area job search assistance and relocation assistance; and

11. English language acquisition programs (34 CFR 463.31) and integrated education and training programs (34 CFR 463.35). For purposes of the VR program and similar to basic career services, individualized career services may encompass some of the activities authorized under 34 CFR 361.48(b), which must be provided under an individualized plan for employment for an eligible individual with a disability (e.g., vocational rehabilitation counseling and guidance, vocational and other training services, and rehabilitation technology).

D. Follow-up Career Services (20 CFR 678.430(c), 34 CFR 361.430(c), and 34 CFR 463.430(c))

Follow-up services must be provided, as appropriate, for Adult and Dislocated Worker program participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Counseling about the work place is an appropriate type of follow-up service. States and local areas should establish policies that define what are considered to be appropriate follow-up services for the Adult and Dislocated Worker programs. Follow-up services do not extend the date of exit in performance reporting. For purposes of the VR program, follow-up career services are similar to post-employment services, as defined in 34 CFR 361.5(c)(42), and are provided subsequent to an individual with a disability achieving an employment outcome. Post-employment services, under the VR program, are necessary in assisting an individual with a disability in maintaining, regaining, or
advancing in employment, consistent with the individual’s unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

**E. Business Services (20 CFR 678.435, 34 CFR 361.435, and 34 CFR 463.435)** Business services support a local workforce development system that meets the needs of businesses in the local area (20 CFR 678.435, 34 CFR 361.435, and 34 CFR 463.435). Through the American Job Centers, applicable One-Stop partners develop, offer, and deliver quality business services that assist businesses and industry sectors in overcoming the challenges of recruiting, retaining, and developing talent for the regional economy. To support area employers and industry sectors most effectively, American Job Center staff, including designated partner program staff, must:

1. Have a clear understanding of industry skill needs;
2. Identify appropriate strategies for assisting employers, and coordinate business services activities across American Job Center partner programs, as appropriate; and
3. Incorporate an integrated and aligned business services strategy among American Job Center partners to present a unified voice when communicating with employers.

Certain career services must be made available to local employers, specifically labor exchange activities and labor market information, as described in 20 CFR 678.430(a)(4)(ii) and (a)(6), 34 CFR 361.430(a)(4)(ii) and (a)(6), and 34 CFR 463.430(a)(4)(ii) and (a)(6). Local areas must establish and develop relationships and networks with large and small employers and their intermediaries. Local areas also must develop, convene, or implement industry or sector partnerships.

**VII. PARTNER ROLES AND SERVICES**

Pursuant to WIOA, the following programs will deliver the following services through the system:

**See Attachment A (“One-Stop Partner Services and Delivery Methods”)**

Generally, each Partner commits to cross-training of staff, as appropriate, and to providing other professional learning opportunities that promote continuous quality improvement. Technical assistance is available to new and existing One-Stop Partners and local grant recipients to ensure all partners are informed and knowledgeable of the elements contained in the MOU and the One-Stop Infrastructure Agreement (IFA). Partners will further promote system integration to the maximum extent feasible through:

A. Effective communication, information sharing, and collaboration with the one-stop operator;
B. Joint planning, policy development, and system design processes;
C. Commitment to the joint mission, vision, goals, strategies, and performance measures;
D. The design and use of common intake, assessment, referral, and case management processes;
E. Use of common and/or linked data management systems and data sharing methods, as appropriate;
F. Leveraging of resources, including other public agency and non-profit organization services;
G. Participation in a continuous improvement process designed to boost outcomes and increase customer satisfaction, and;

H. Participation in regularly scheduled Partner meetings to exchange information in support of the above and encourage program and staff integration.

VIII. CO-LOCATION
The Parties of this MOU may choose to co-locate in the One-Stop Career Center in the City of Atlanta. The One-Stop center is located at: 818 Pollard Boulevard, SW Atlanta, GA 30315.

IX. BUDGET
The IFA will be reviewed annually and reconciled quarterly against actual costs incurred and adjusted accordingly to ensure that it reflects a cost allocation methodology that demonstrates how infrastructure costs are charged to each Partner in proportion to its use of the One-Stop Career Center and relative benefit received, and that complies with 2 CFR part 200, or any corresponding similar regulation or ruling. The IFA will also ensure that no funds are in obligation for any Party’s use of the One-Stop Career Center outside of the fiscal year (July 1 – June 30) those costs were incurred and billed.

See Attachment B (“One-Stop Cost Methodology”)
See Attachment C (“PY19/FY20 One-Stop Partner Annual Budget Allocation”)

X. OVERSIGHT AND REPORTING

A. Oversight. The Parties shall be responsible for ensuring all staff are aware of the provisions of this MOU and that service delivery and referrals occur in compliance with these provisions. At least annually, the Parties will meet to review their success in complying with the responsibilities identified in this MOU. This review will cover successes, needed improvements, any outstanding and/or unresolved issues, review of reports, and other necessary items. One point of contact for each Party will participate in the oversight review.

In the event that one of the Parties has been unable to follow the guidelines in this MOU or has experienced constraints in meeting those guidelines, that Party shall first make best efforts to implement an alternative solution which is in alignment with those guidelines. If such a solution is ineffective, the Party shall confer with the other Parties to this MOU to develop alternative strategies or solutions which are effective.

B. Reporting. After oversight review of this MOU, the Parties shall prepare a Summary Report to be shared with all the Parties and shall describe the following:

1. General issues and concerns related to the Party’s ability to fulfill its own responsibilities identified in this MOU;
2. Specific constraints or limitations impeding the Party’s ability to meet terms of MOU;
3. A funding update and status of the Party’s ability to maintain its infrastructure costs sharing obligations;
4. Any anticipated budget challenges that may affect the next program year’s funding which would impact the infrastructure cost sharing agreement;
5. Any innovative business decisions, organizational restructuring, or program changes that might impact operations in the next program year;
6. Identification of any coordination issues between the Parties and recommendation of strategies and solutions to improve such coordination; and
7. Requested adjustments or modifications to the provisions of this MOU as a result of this annual monitoring.

XI. MOU RENEWAL
Within ninety (90) days prior to the end date of this MOU, the Parties shall review the MOU and negotiate any needed changes to the provisions herein. The Parties shall collaboratively evaluate the effectiveness of operations pursuant to this MOU, make necessary modifications, and may, upon agreement of all partners, renew the MOU for a term to be determined at the time of renewal. The review of the MOU shall include:

A. An analysis of the successes and challenges in operations pursuant to these provisions;
B. A review of the annual Summary Reports;
C. Infrastructure cost sharing methodologies;
D. Any programmatic budgetary changes that may impact a Party’s responsibilities; and,
E. Consideration of issues/findings/recommendations identified in Parties’ annual Summary Reports.

XII. COMMUNICATIONS

A. General Procedures.
In the event that a Party experiences difficulty in complying with the provisions of this MOU, that Party shall notify the other Parties of the issue and request communications to strategize and problem solve the issue. Notice shall be provided via email to the contacts identified in Section “Q.” below and/or to the WDB One-Stop Committee members to address the issues.

B. Information/Data Sharing.
Partners agree that the use of high-quality, integrated data is essential to inform decisions made by policymakers, employers, and job seekers. Additionally, it is vital to develop and maintain an integrated case management system, as appropriate, that informs customer service throughout customers’ interaction with the integrated system and allows information collected from customers at intake to be captured once.

Partners further agree that the collection, use, and disclosure of customers’ personally identifiable information (PII) is subject to various requirements set forth in Federal and State privacy laws. Partners acknowledge that the execution of this MOU, by itself, does not function to satisfy all of these requirements. All data, including customer PII, collected, used, and disclosed by Partners will be subject to the following:

1. Customer PII will be properly secured in accordance with the Local WDB’s policies and procedures regarding the safeguarding of PII.
2. The collection, use, and disclosure of customer education records, and the PII contained therein, as defined under FERPA, shall comply with FERPA and applicable State privacy laws.
3. All confidential data contained in UI wage records must be protected in accordance with the requirements set forth in 20 CFR part 603 and O.C.G.A. § 34-8-120 et seq.
4. All personal information contained in VR records must be protected in accordance with the requirements set forth in 34 CFR 361.38.
5. Customer data may be shared with other programs, for those programs’ purposes, within the American Job Center network only after the informed written consent of the individual has been obtained, where required.
6. Customer data will be kept confidential, consistent with Federal and State privacy laws and regulations.
7. All data exchange activity will be conducted in machine readable format, such as HTML or PDF, for example, and in compliance with Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 (d))

All One-Stop center and partner staff will be trained in the protection, use, and disclosure requirements governing PII and any other confidential data for all applicable programs, including FERPA-protected education records, confidential information in UI records, and personal information in VR records.

No Party shall disclose PII or other personal or confidential information, requested by legal process of otherwise, received from another party pursuant to this MOU, without the express written approval of the Party from which the information originated. In such matters, the Party from which the information originated will determine whether the information may legally be disclosed. The Party for which the information was requested may only release the requested information after receiving written instructions from the Party from which the information originated.

XIII. CONFIDENTIALITY
All Parties expressly agree to abide by all applicable Federal, State, and local laws and regulations regarding confidential information, including PII from educational records, confidential information in UI records, and personal information in VR records.

Each Party will ensure that the collection and use of any information, systems, or records that contain PII and other personal or confidential information will be limited to purposes that support the programs and activities described in this MOU and will comply with applicable law. Each Party will ensure that access to software systems and files under its control that contain PII or other personal or confidential information will be limited to authorized staff members who are assigned responsibilities in support of the services and activities described herein and will comply with applicable law.

Each Party expressly agrees to take measures to ensure that no PII or other personal or confidential information is accessible by unauthorized individuals. To the extent that confidential, private, or otherwise protected information needs to be shared amongst the Parties for the Parties’ performance of their obligations under this MOU, and to the extent that such sharing is permitted by applicable law, the appropriate data sharing agreements will be created and required confidentiality and ethical certifications will be signed by authorized individuals.

With respect to confidential unemployment insurance information, any such data sharing must comply with all requirements in 20 CFR Part 603, including but not limited to requirements for an agreement consistent with 20 CFR 603.10, payments of costs, and permissible disclosures. With respect to the use and disclosure of FERPA-protected customer education records and the PII contained therein, any such data sharing agreement must comply with all of the requirements set forth in 20 U.S.C. § 1232g and 34
CFR Part 99. With respect to the use and disclosure of personal information contained in VR records, any such data sharing agreement must comply with all of the requirements set forth in 34 CFR 361.38.

XIV. REFERRALS
The primary principle of the referral system is to provide integrated and seamless delivery of services to workers, job seekers, and employers. In order to facilitate such a system, Partners agree to:

A. Familiarize themselves with the basic eligibility and participation requirements, as well as with the available services and benefits offered, for each of the Partners’ programs represented in the WorkSource Atlanta One Stop Center;

B. Develop materials summarizing their program requirements and making them available for Partners and customers;

C. Develop and utilize common intake, eligibility determination, assessment, and registration forms;

D. Provide substantive referrals – in accordance with the LWDA Referral Policy – to customers who are eligible for supplemental and complementary services and benefits under partner programs;

E. Regularly evaluate ways to improve the referral process, including the use of customer satisfaction surveys;

F. Commit to robust and ongoing communication required for an effective referral process, and;

G. Commit to actively follow up on the results of referrals and assuring that Partner resources are being leveraged at an optimal level.

XV. ASSURANCES

A. Entire Understanding
This Agreement is intended as the complete integration of all understandings between the Parties. No prior or contemporaneous addition, deletion, or other amendment shall have any force or effect whatsoever, unless embodied herein in writing. No subsequent notation, renewal, addition, deletion, or other amendment shall have any force or effect unless embodied in a written amendment executed and approved by the Parties of this Agreement.

B. Relationship of Parties
To the extent set forth or otherwise permitted by applicable law, the Parties shall be solely responsible for the acts or omissions of its employees, agents, subcontractors, service provider, and licensees. The Parties shall not have any authorization, express or implied, to bind the State or Administrative Entity to any agreements, liability, or understanding except as expressly set forth herein and shall be solely responsible for the acts or omissions of its own employees, agents, subcontractors, service provider, and licensees.

Local organizations often function simultaneously in a variety of roles, including local fiscal agent, Local WDB staff, one-stop operator, and direct provider of services. Any organization that has been selected or otherwise designated to perform more than one of these functions must develop a written
agreement with the Local Workforce Development Board and Chief Local Elected Official Board/Regional Commission Board to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars, and the State's conflict of interest policy. §679.430

All partners agree to respect each other's organizational practices and management structures in the provision of services under this agreement.

By executing the MOU each partner agrees to work together to deliver One Stop services for employers, and those seeking employment. However, the partners are not legally “partners” to the extent that term encompasses joint and several liability. Each partner under this MOU is responsible for its own employees, representatives and agents.

C. Modifications and Amendments
This MOU may be modified, revised, or amended by mutual written consent of all signatory Parties in accordance with the timeline below. A written request must be submitted to the named parties listed in the “notice” section. The modification shall not be effective unless agreed to in writing by all Parties in an Amendment to this MOU, properly executed and approved in accordance with applicable Federal, State and Local Fiscal Rules.

1. Primary MOU changes – would change cost sharing amounts and signatories to the agreement.
2. Adjustments to MOU responsibilities – would not modify the cost sharing agreement but may be a change in the specific programs or services.
3. Partners may request, in writing, an amendment to the MOU through the WDB. The WDB may amend the MOU whenever the WDB determines it is appropriate or necessary.
4. In order for any modification to this MOU to be valid, the changes must be documented in writing, signed and dated under the conditions agreed upon by ALL of the partners, and attached to the original MOU. Revisions to the Cost Allocation Plan must include signatures of all partners and require incorporation through a modification into the MOU. If any provision of the MOU is held invalid, the remainder of the MOU will not be affected.

D. Dispute Resolution
If an impasse arises between the partners and/or the WDB regarding the terms and conditions, the performance or administration of this MOU, the following procedure must be initiated:

1. All Parties are advised to actively participate in Local negotiations in a good faith effort to reach agreement. Any disputes shall first be attempted to be resolved informally.
2. Should informal resolution efforts fail, the dispute resolution process must be formally initiated by the petitioner seeking resolution.
3. The petitioner must send a notification to the LWDB Chair (or designee) and all Parties to the MOU regarding the conflict within 108 business days.
4. The LWDB Chair (or designee) shall place the dispute on the agenda of a special meeting of the LWDB’s Executive Committee. The Executive Committee shall attempt to mediate and resolve the dispute. Disputes shall be resolved by a 2/3 majority consent of the Executive Committee members present.
5. The decision of the Executive Committee shall be final and binding unless such a decision
is in contradiction of applicable State and Federal laws or regulations governing the Partner agencies.

6. The right of appeal no longer exists when a decision is final. Additionally, final decisions will not be precedent-setting or binding on future conflict resolutions unless they are officially stated in this procedure.

7. The Executive Committee must provide a written response and dated summary of the proposed resolution to all Parties to the MOU.

8. The LWDB Chair (or designee) will contact the petitioner and the appropriate Parties to verify that all are in agreement with the proposed resolution.

E. Termination
This MOU will remain in effect until the end date specified in the Effective Period section unless:

1. All Parties mutually agree to terminate this MOU prior to the end date.
2. Federal oversight agencies charged with the administration of WIOA are unable to appropriate funds or if funds are not otherwise made available for continued performance for any fiscal period of this MOU succeeding the first fiscal period. Any party unable to perform pursuant to MOU due to lack of funding shall notify the other Parties as soon as the party has knowledge that funds may be unavailable for the continuation of activities under this MOU.
3. WIOA is repealed or superseded by subsequent federal law.
4. Local area designation is changed under WIOA.
5. A party breaches any provision of this MOU and such breach is not cured within thirty (30) days after receiving written notice from the LWDB Chair specifying such breach in reasonable detail. If the non-breaching party(s) has the right to terminate the MOU by giving written notice thereof to the party in breach, upon which termination will go into effect immediately.

In the event of termination, the Parties to the MOU must convene within thirty (30) days after the breach of the MOU to discuss the formation of the successor MOU. At that time, allocated costs must be addressed.

F. Nondiscrimination and Equal Opportunity
All Parties to this MOU:

1. Must not discriminate in deciding who will be admitted, or have access, to any federally-funded program or activity; providing opportunities in, or treating any person with regard to, such a program or activity.
2. Certify that as a recipient of federal financial assistance, they will not discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in federally-funded programs, on the basis of the individual's citizenship status or participation in any federally-funded program or activity.
3. Ensure no person, otherwise qualified, is denied employment, services, or other benefits on the basis of: (i) political or religious opinion or affiliation, marital status, sexual orientation, gender, gender identification and/or expression, race, color, creed, or national origin; (ii) sex or age, except when age or sex constitutes a bona fide occupational qualification; or (iii) the physical or mental disability of a qualified individual with a disability.
4. Agree that they will comply with Section 188 of the WIOA Nondiscrimination and Equal

G. Accessibility
Accessibility to the services provided by the One-Stop Center and all Partner agencies is essential to meeting the requirements and goals of the center network. Job seekers and businesses must be able to access all information relevant to them via visits to physical locations as well as in virtual spaces, regardless of gender, age, race, religion, national origin, disability, veteran’s status, or on the basis of any other classification protected under state or federal law.

Partners must assure they have policies and procedures in place to address these issues, and such policies and procedures have been disseminated to their employees and otherwise posted as required by law.

Partners further assure they are currently in compliance with all applicable state and federal laws and regulations regarding these issues. All Partners will cooperate with compliance monitoring conducted at the local level to ensure all One-Stop Center programs, services, technology, and materials are physically and programmatically accessible and available to all. Additionally, staff members will be trained to provide services regardless of range of abilities, mobility, age, language, learning style, or comprehension or education level. An interpreter will be provided in real time or, if not available, within a reasonable timeframe to any customer with a language barrier. Assistive devices and assistive listening devices must be available to ensure physical and programmatic accessibility.

H. Monitoring
The LWDB, or its designated staff, officials from State and local administrative entities, the U.S. Departments of Labor, Education, and Health and Human Services have the authority to conduct fiscal and programmatic monitoring to ensure that:

1. Federal awards are used for authorized purposes in compliance with law, regulations, policies.
2. Those laws, regulations, and policies are enforced properly.
3. Performance data are recorded, tracked, and reviewed for quality to ensure accuracy and completeness,
4. Outcomes are assessed and analyzed periodically to ensure that performance goals are met.
5. Appropriate procedures and internal controls are maintained; record retention policies are followed.
6. All MOU terms and conditions are fulfilled. All Parties to this MOU should expect regular fiscal and programmatic monitoring to be conducted by each of the above entities, as appropriate.

I. Signature in Counterparts
This MOU may be executed in multiple identical counterparts, all of which shall constitute one agreement.

J. Acceptance of Facsimile or Scanned Signatures
This MOU is considered signed when the signature of a party is delivered by facsimile transmission or delivered by scanned image (e.g., pdf, or tiff file extension name) as an attachment to electronic mail (email). Such facsimile or scanned signature shall be treated in all respects as having the same effect as an original signature.
K. Insurance Requirements
The parties recognize the partnership may consist of various levels of government, not-for-profit and for-profit entities. Each party to this agreement shall be responsible for injury to persons or damage to property resulting from negligence on the part of itself, its employees, its agents, or its officers. No partner assumes any responsibility for any other party, state or non-state, for the consequences of any act of omission of any third party. The parties acknowledge the One-Stop Operator has no responsibility and/or liability for any actions of the One-Stop Center employees, agents, and/or assignees. Likewise, the parties have no responsibility and/or liability for any actions of the One-Stop Operator.

L. Non-Assignment
Except as otherwise indicated, no Party may, during the term of this MOU or during any renewals or extensions, assign or subcontract all or any part of the MOU without prior written consent of all Parties.

M. Applicable record retention provision
Any and all records related to the operation, customers and administration of this MOU shall be maintained for a period of seven years from the termination date of this MOU.

N. Governing Laws
This MOU will be construed, interpreted, and enforced according to the laws of the State of Georgia. All Parties shall comply with all applicable Federal and State laws and regulations, and Local laws to the extent that they are not in conflict with State or Federal requirements.

O. Force Majeure
Performance under this MOU may be waived due to an act of God or extraordinary circumstance/event.

Billing and payments will be made annually and processed through the City of Atlanta and reconciled quarterly.

XVI. SIGNATURES

By executing this memorandum of Understanding (MOU), as evidenced by the signatures set forth below, all parties represent that they have received a copy of this MOU, have reviewed the MOU, find it accurately reflects a general understanding of their role as a partner in the One Stop Centers, and agree to participate in and fully support all of the procedures, policies and processes set forth therein without reservation. The person(s) signing this MOU on behalf of each partner and/or its organization represent that they are duly authorized by the partner and/or its organization to execute this Memorandum of Understanding on its behalf

[Signature Pages to Follow]
FOR THE PARTNER: Atlanta Workforce Development Agency (a/k/a WorkSource Atlanta)

BY:

Kimberlyn Daniel  
Print Name

Interim Executive Director  
Title

Signature  
Date June 4, 2019
FOR THE PARTNER: Georgia Department of Labor

BY:

CHRISTINA SMITH

Print Name

CHIEF OF STAFF

Title

Signature

Date

MAY 09, 2019
FOR THE PARTNER: Atlanta Independent School System

BY:

David Teregun

Print Name

Title

Signature

Date

6-11-19

APS Office of General Counsel

Approved By:

PY19 Atlanta Independent School System
FOR THE PARTNER: Georgia Vocational Rehabilitation Agency

BY:

Shawn Ryan  
Print Name

Executive Director  
Title

Signature  
Date  7/19/19
FOR THE PARTNER: Fulton-Atlanta Community Action Authority

BY:

DeJoyce J. Dorsey
Print Name

President/CEO
Title

Signature

Date 5/28/19
FOR THE PARTNER: ATLANTA TECHNICAL COLLEGE

BY:

Victoria Seals
Print Name

President
Title

Signature [Signature]

Date 8-7-19

18
FOR THE PARTNER: Housing Authority of the City of Atlanta, Georgia

BY:

[Signature]

Print Name

[Title]

[Signature]

Date 6/10/19
FOR THE PARTNER: MTC Corporation/Brunswick Job Corps Center

BY:

Mel Gaines
Print Name

Center Director
Title

Signature

8-23-19
Date
FOR THE PARTNER: AARP Foundation

BY:

Demetrios Antzoulatos

Print Name

VP—Finance, Operations & Grants

Title

Signature 8-2-19

Date
### A. Basic Career Services (available to all job seekers)

<table>
<thead>
<tr>
<th>Manner in which services will be provided</th>
<th>On-premises</th>
<th>On-premises</th>
<th>On-premises</th>
<th>On-premises</th>
<th>Virtual</th>
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<tbody>
<tr>
<td>Mandated Program</td>
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<td>Wagner-Peyser</td>
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<td>Fulton-Atlanta Community Action Authority</td>
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</table>

1. Eligibility for partner program services
2. Initial assessment, including but not limited to, skill levels, literacy, numeracy, English language proficiency, aptitudes, abilities, skills gaps, and support service needs
3. Job search, placement assistance and career counseling
4. Workforce and employment labor market information and statistics
5. Performance and program cost information on eligible training providers
6. Performance information relating to the One-Stop center
7. Financial aid assistance for training and education programs not provided under WIOA
8. Information and assistance regarding filing claims under UI programs
9. Supportive Services
## ATTACHMENT A

<table>
<thead>
<tr>
<th></th>
<th>WIOA Title I-B</th>
<th>AARP</th>
<th>AHA</th>
<th>GDOL</th>
<th>HUD</th>
<th>ATC</th>
<th>FACA</th>
<th>TCSG</th>
<th>GVRA</th>
<th>WIOA Title I-B</th>
<th>CSBG</th>
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<tbody>
<tr>
<td>Mandated Program</td>
<td>Adult, DW, Youth, YouthBuild</td>
<td>Wagner-Peyser</td>
<td>Trade Adjustment Assistance</td>
<td>Jobs for Veterans</td>
<td>SCSEP</td>
<td>Adult Education &amp; Literacy</td>
<td>Postsecondary Career &amp; Technical Education</td>
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<td>Vocational Rehabilitation</td>
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<td>Manner in which services will be provided</td>
<td>On-premises</td>
<td>On-premises</td>
<td>On-premises</td>
<td>On-premises</td>
<td>Virtual</td>
<td>On-premises</td>
<td>On-premises</td>
<td>Virtual</td>
<td>Virtual</td>
<td>On-premises</td>
<td>Virtual</td>
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</tbody>
</table>

### B. Individualized Career Services (available to all job seekers if determined to be appropriate in order for an individual to obtain or retain employment)

1. Comprehensive/specialized assessments of skill level/service needs of adults/dislocated workers
   - X X X X X X X X
2. Development of Individual Employment Plan to identify employment goals, appropriate achievement objectives and combination of services to achieve employment goals
   - X X X X X
3. Group and/or individual counseling and mentoring
   - X X X X X X
4. Career planning
   - X X X X X
5. Short-term prevocational services, including training, communication, interviewing, personal maintenance skills, punctuality, professional conduct
   - X X X X X
6. Internships and work experience linked to careers
   - X X X X X
7. Workforce preparation activities to acquire combination of basic academic, critical thinking, digital literacy, self-management skills, competencies to utilize resources/information, working with others, understanding systems, skills necessary for successful transition into and completion of postsecondary education, training, or employment
   - X X X X X
8. Financial literacy services
   - X X X X X
9. Out-of-area job search and relocation assistance
   - X X X
10. English language acquisition and integrated education and training
    - X X X
## ATTACHMENT A

<table>
<thead>
<tr>
<th>MOS Partners</th>
<th>WSA</th>
<th>GDOL</th>
<th>GDOL</th>
<th>GDOL</th>
<th>AARP</th>
<th>AVG</th>
<th>POSS</th>
<th>ATC</th>
<th>Atlanta Job Corps</th>
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<td>WIOA Title I - Adult, DW, Youth, YouthBuild</td>
<td>Wagner Peyser</td>
<td>Trade Adjustment Assistance</td>
<td>Jobs for Veterans</td>
<td>Unemployment Compensation</td>
<td>SROEP</td>
<td>HUD</td>
<td>Adult Education &amp; Literacy</td>
<td>Postsecondary Career &amp; Technical Education</td>
<td>WIOA Title I</td>
<td>Vocational Rehabilitation</td>
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<tr>
<td>Manner in which services will be provided</td>
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<td>On-premises</td>
<td>On-premises</td>
<td>Virtual</td>
<td>On-premises</td>
<td>Virtual</td>
<td>Virtual</td>
<td>On-premises</td>
<td>Virtual</td>
<td></td>
</tr>
</tbody>
</table>

### C. Training Services

1. Occupational skills training, including for nontraditional employment
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

2. On-the-job training (OJT), including registered apprenticeship
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

3. Incumbent worker training
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

4. Workplace training and cooperative education programs
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

5. Private sector training programs
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

6. Skills upgrading and retraining
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

7. Entrepreneurial training
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

8. Transitional jobs in accordance with WIOA §134(d)(5)
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

9. Job readiness training provided in combination with other training described above
   - On-premises
   - On-premises
   - On-premises
   - On-premises
   - Virtual
   - Virtual
   - Virtual
   - Virtual

10. Adult education and literacy activities
    - On-premises
    - On-premises
    - On-premises
    - On-premises
    - Virtual
    - Virtual
    - Virtual
    - Virtual

11. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training
    - On-premises
    - On-premises
    - On-premises
    - On-premises
    - Virtual
    - Virtual
    - Virtual
    - Virtual

2019.05.24
## ATTACHMENT A

<table>
<thead>
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<th>Mandatory Program</th>
<th>WIOA Title I &amp; II - Adult, DW, Youth, YouthBuild</th>
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<td>Manner in which services will be provided</td>
<td>On-premises</td>
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### D. Employer Services

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<td>2. Rapid response and layoff assistance</td>
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<tr>
<td>3. Employer information/referral</td>
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<td>4. Recruitment services</td>
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<td>5. Tax credit/incentive information</td>
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<td>8. Staff training</td>
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</table>
One-Stop Infrastructure Costs:
The City of Atlanta’s Comprehensive One-Stop, American Job Center, is located at 818 Pollard Boulevard, SW, Atlanta, GA 30315. The building is owned by the City of Atlanta; therefore, the Atlanta Workforce Development Agency (“AWDA”), also known as WorkSource Atlanta, does not pay for facility costs. These costs are provided as in-kind contributions by the City of Atlanta and are estimated to be One Hundred Seventy-Five Thousand Eight Hundred Fifty-Four Dollars and Zero Cents ($175,584). The estimated costs include security services, maintenance, and housekeeping.

The space occupied by partners will include basic furniture, building related services, maintenance, security, and telephone and computer and internet access. The shared costs will be allocated to partners based on square footage allocated to the One Stop Center.

Local One-Stop Delivery System Costs:
Local One-Stop Delivery costs items include office supplies and non-consumable supplies (scanners, printers, calculators, etc.). The estimated costs reflect WSA’s historical costs for those supplies. The costs are proportionately divided between WSA’s core staff portion ($11,832) and the estimated portion for the one-stop partners ($17,748) to ensure that the partners are only assessed their fair share of the estimated costs.

Local One-Stop Delivery System Costs:
The Atlanta Workforce Development Agency will absorb 100% of the cost of the One-Stop Operator. The total cost during the initial term of the Agreement is a not to exceed amount payable by the City of Atlanta of One Hundred Sixty-Seven Thousand, One Hundred and Zero Cents ($167,100).

Cost Allocation Methodology:
The partners have agreed to use square footage as the basis for allocating shared costs. The average amount of space allotted for various types of one-stop presence is as follows:

- Cubicle - 120 sq. ft.
- Office - 240 sq. ft.
- Computer Lab - 360 sq. ft.
- Common Area/Resource Library - 360 sq. ft.

WSA proposes to charge for virtual location based on the price of a cubicle. (The cubicle measurement is described above). The access spot will include a computer, a phone line, and all
required ADA accommodations. The price for the access spot will be equally divided by the number of partners that are co-locating virtually.

**Invoicing:**
All costs associated with One-Stop operations will be accumulated and charged separately from other AWDA and City of Atlanta activity. Partners should expect an accounting of actual costs no less than on a quarterly basis. Payment is due upon receipt of the invoice from WSA.

Please remit to:

WorkSource Atlanta
818 Pollard, Boulevard, SW
Atlanta, GA 30315
ATTN: Buffy Gray, Interim Director of Finance
### WorkSource Atlanta American Job Center
#### Annual Budget
#### Allocation to Partners - Square Footage

<table>
<thead>
<tr>
<th>Other Shared Costs</th>
<th>Telecommunication &amp; Internet</th>
<th>Equipment &amp; Technology costs</th>
<th>Data Gathering</th>
<th>Office Supplies/Non-Consumables</th>
<th>Facility (Infrastructure) Costs (2)</th>
<th>Career Services</th>
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<tr>
<td></td>
<td>$1,200</td>
<td>$30,400</td>
<td>$11,000</td>
<td>$11,832</td>
<td>$17,584</td>
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<tr>
<td>% Shared Allocation</td>
<td>60%</td>
<td>60%</td>
<td>0%</td>
<td>60%</td>
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<td>60%</td>
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<tr>
<td>Total Other Shared Costs</td>
<td>$1,800</td>
<td>$45,600</td>
<td>$-</td>
<td>$17,748</td>
<td>$17,584</td>
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<td>Grand Total</td>
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<td>$11,000</td>
<td>$29,580</td>
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#### Cost Allocation

<table>
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<tr>
<th># of Cubicle</th>
<th>WorkSource Atlanta (1)</th>
<th>Career Services (5)</th>
<th>Infrastructure Cost (3)</th>
<th>% Shared Services Allocation</th>
<th>Total Other Shared Costs</th>
<th>Grand Total</th>
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<tbody>
<tr>
<td>8</td>
<td>960</td>
<td>1440</td>
<td>360</td>
<td>2760</td>
<td>35%</td>
<td>52%</td>
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<td>$54,432</td>
<td>$183,385</td>
<td>$175,584</td>
<td>$65,148</td>
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#### Partner's Allocation:

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<td>Atlanta Public Schools 3</td>
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<td>1</td>
<td>Virtual Cubicle (4)</td>
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#### Virtual Office Participants:

- AARP: $1,086
- Fulton-Atlanta Community Action Authority: $1,086
- Atlanta Technical College: $1,086

#### Legend:

(1) Not included in cost sharing.
(2) Not included in cost sharing. Does not include rent and utilities.
(3) Infrastructure Cost includes rent, utilities and maintenance and repairs that are borne by the City of Atlanta and not charged to the One-Stop Center.
(4) Virtual Cubicle will be available to customers that requires services from the Partners that are not located at the One-Stop Center. The Virtual Cubicle will have a computer, screen, camera and telephone for the customer.
(5) Career Services include programmatic expenses that include ITA, WEX, OJT and other supportive services and are estimated at 10% of WSA’s annual program services budget. These costs will not be charged to the Partners directly. WSA will work with each partner to determine what in-kind services will be
Agenda Section VII.
Action Item
Eligible Training Provider Policy
Eligible Training Provider: Second Level Appeals Process

I. Purpose
The purpose of this policy is to revise WorkSource Atlanta’s State-level appeals process for Eligible Training Providers.

II. Effective Date
November 18, 2015

III. Revised
November 21, 2019

III. Background
Exhibit F of WSA’s Eligible Training Provider application will be updated with the language below.

Exhibit F
Second Level Appeal
If the Training Provider does not receive a decision from WorkSource Atlanta within 60 days of the filing of the appeal or receives an unsatisfactory decision, the Training Provider has the right to file a second level appeal directly with the State Workforce Development Board (SWDB). The appeal should be submitted through the staff liaison for the SWDB’s Performance and Accountability Committee. The staff liaison is Steven Wilson (SWilson@tcsge.edu). The following criteria must be satisfied when submitting the second level appeal:

1) The Training Provider has/have completed SWDB’s Eligible Training Provider List (ETPL) Appeals form;
2) The Training Provider attaches WorkSource Atlanta’s written decision and any other pertinent information to SWDB’s ETPL Appeals form; and,
3) The appeal is filed with SWDB no later than 30 days from the date that WorkSource Atlanta issued its written decision.

The Training Provider shall have the option of requesting a hearing if the Second Level Appeal cannot be resolved informally. In the event that a hearing is requested in writing, it will be conducted in accordance with the procedure set forth below. SWDB’s ruling shall be final.

SWDB procedures for appeals of denial or removal of a Training Provider from the State ETPL are such that a Training Provider may file an appeal directly with SWDB in the event that the Training Provider is denied eligibility or is removed from the State ETPL. In order to appeal, the Training Provider must satisfy the following criteria:

1) The Training Provider must complete SWDB’s ETPL Appeal form;
2) The Training Provider must include all other pertinent information; and,
3) The Training Provider must file the appeal no later than 30 days from the date the Training Provider is denied eligibility or is terminated from the State ETPL.
The Training Provider shall have the option of requesting a hearing in the event that the appeal cannot be resolved informally. If a hearing is requested in writing, it will be conducted in accordance with the procedure set forth below. The SWDB’s ruling on all Appeals shall be final.

**Hearing Procedure: State & Local Eligible Training Provider List Determination Appeal**

As required by WIOA, every Training Provider shall have the opportunity for a hearing for any appeal that is filed. A request for a hearing must be made in writing by the Training Provider, preferably at the time the appeal is initially filed. However, a Training Provider may file a written request for a hearing within 60 days of the date the appeal was filed. If a request for a hearing is made, then the hearing shall be held as soon as reasonably possible but no later than sixty (60) days from the day the appeal is filed. WorkSource Atlanta and SWDB shall use the following procedures if a hearing is requested:

Upon receiving written notice of the Training Provider’s request for a hearing, WSA or SWDB shall respond in writing acknowledging the Training Provider’s request and setting the date of the hearing. Such acknowledgment and notice shall be transmitted to the Training Provider within 10 business days of receipt of the request. The notice shall include, at a minimum:

1) The date of issuance;
2) The name of the Training Provider;
3) The name of the Respondent against whom the appeal has been filed (SWDB or WSA);
4) A statement reiterating that the Training Provider and Respondent may be represented by legal counsel at the hearing;
5) The date, time, and place of the hearing, including the name of the hearing officer serving as an impartial party;
6) A statement of the alleged violations of WIOA, (this may include clarification of the original appeal, but must accurately reflect the content of the Training Provider’s submitted documentation);
7) A copy of any policies or procedures for the hearing or identification of where such policies may be found; and
8) The name, address, and telephone number of the contact person issuing the notice.

The hearing shall be conducted in compliance with federal regulations. At a minimum, the hearing must include:

1) An impartial hearing officer selected by WSA or SWDB;
2) An opportunity for both the Training Provider and WSA or SWDB to present an opening statement, witnesses and evidence;
3) An opportunity for each party to cross-examine the other party’s witnesses; and,
4) A record of the hearing which WSA or SWDB shall create and retain.

The hearing officer, considering the evidence presented by the Training Provider and Respondent, shall issue a written decision which shall serve as WSA’s or SWDB’s official resolution of the appeal. The decision shall include the following information, at a minimum:
1) The date, time, and place of hearing;
2) A recitation of the issues alleged in the appeal;
3) A summary of any evidence and witnesses presented by the Training Provider and respondent;
4) An analysis of the issues as they relate to the facts; and,
5) A decision addressing each issue alleged in the appeal.

The SWDB meets every quarter. State level hearings shall be conducted in accordance with this schedule. To appeal to the SWDB and/or request a hearing, ETPs shall send all communication in writing to the staff liaison (Steven Wilson at SWilson@tcsg.edu) of the SWDB Performance and Accountability Committee.
Agenda Section VII.

Action Item

Participant Medical Records Policy
Storage and Use of Medical and Disability-Related Participant Information

I. Purpose
The purpose of this policy is to communicate the Workforce Innovation and Opportunity Act (“WIOA”) requirements for ensuring security of participant medical and disability-related information. WorkSource Atlanta staff and subrecipients are required to safeguard the privacy provided by individuals seeking WIOA services.

II. Effective Date
November 21, 2019

III. Background
The general and permanent rules and regulations of WIOA are codified in the Code of Federal Regulations. The security of WIOA participant medical and disability related information is addressed in 20 C.F.R. 38.41(b)(3) as follows:

20 C.F.R. 38.41 Collection and maintenance of equal opportunity data and other information.
(b)(3) Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they must be locked or otherwise secured (for example, through password protection).

(i) Knowledge of disability status or medical condition and access to information in related files. Persons in the following categories may be informed about an individual's disability or medical condition and have access to the information in related files under the following listed circumstances:

(A) Program staff who are responsible for documenting eligibility, where disability is an eligibility criterion for a program or activity.
(B) First aid and safety personnel who need access to underlying documentation related to a participant's medical condition in an emergency.
(C) Government officials engaged in enforcing this part, any other laws administered by the Department, or any other Federal laws. See also §38.44.
Knowledge of disability status or medical condition only. Supervisors, managers, and other necessary personnel may be informed regarding restrictions on the activities of individuals with disabilities and regarding reasonable accommodations for such individuals.

IV. Policy

Personal and confidential information that contains health information related to a physical or mental disability, medical diagnosis, or perception of a disability related to the individual must be kept in a separate locked file and apart from working case files. Case managers should include a case note in the participant’s Virtual OneStop (VOS) file that states additional information regarding the medical or disability status of the participant is available by contacting the Executive Director, Deputy Director, and/or Program Director who have access to these separate locked participant files.

Any medical information contained in case notes must be redacted from the participant file. The original notes must be placed in the participant’s separate locked file.

Access to medical files:

➢ Must be limited and should only occur with the approval of program management (Executive Director, Deputy Director, and/or Program Director) and only when such access is necessary to facilitate a WIOA participant’s access to services or to support an ongoing service plan; or,
➢ First aid and safety personnel may be provided participant medical information in the event of an emergency; or,
➢ Local, state, or federal monitors in compliance with 29 C.F.R. 32.44(c) and 29 C.F.R. Part 38.60 may have access to medical files for monitoring purposes.

When all services, including follow-up, are complete and the participant file is ready to be archived, participant medical and disability-related information that had been previously filed away from the active file must be placed in a sealed envelope and marked “Medical and/or Disability Information” and secured in a separate locked file.

VII. References

− 29 C.F.R. 38.41(b)(3)
− Technical College System of Georgia, Office of Workforce Development WIOA Policies & Procedures Manual (dated 2018-08-8), Section 3.2.1 (VII)
Agenda Section VII.

Action Item

Pick Up Policy
WorkSource Atlanta
Individual Training Account Pick Up Policy

This policy concerns students who are already enrolled in training using non-WIOA funds. These students are using programs such as PELL, HOPE, Trade Assistance, Student Loans, Scholarships and/or other sources of financial aid, and find themselves in need of WIOA assistance to complete training, either to augment existing funding or replace funding that has been lost.

A. Prior to consideration for pick up funding status, a student must meet all WIOA participant eligibility requirements. An exception to can arise when a student is enrolled in school at the time they are laid off from work.

B. Pick up is only available for students enrolled in state, technical or private schools that are on the State’s Eligible Training Provider List (ETPL).

C. Students will be required to provide adequate labor market information to justify that training-related employment is likely for individuals with similar work histories and education.

D. Pick up will not be considered for schools for which financial obligations are fully completed at onset of training (financial agreements that have previously been established prior to WIOA request). If the fully obligated amount is being paid on a scheduled basis, this is not the same as the school being on a quarter/semester calendar.

E. WIOA funds will not pay an outstanding balance for a school’s cost for which an individual has already made personal commitment for payment.

F. WIOA funds cannot be used for any learning support (remedial or developmental studies) classes.

G. All pick up students must have prior staff approval.
   - Appropriate documentation and explanation of the inability of the participant to continue due to financial constraints or other reasons must be provided with the request.
   - This includes an explanation of why the previous funding method is now inadequate.

H. To be considered for pick up, the student must have no less than a 2.5 Cumulative Grade Point Average (GPA) at the time of financial request.
   - A copy of the student’s transcript from the approved training provider showing the current cumulative GPA will be required as documentation.
I. Additional required documentation includes:
   − An acceptance letter into the program (ensure that pre-requisites have been satisfied prior to WIOA approval);
   − Financial aid award or denial letters (or financial aid information printed directly from Banner account);
   − Schedules and fee assessments.

J. In certain instances, students requesting pick-up may not be required to complete a full array of career services if they are enrolled in the Georgia Technical College or University System or a private institution where there is documented evidence of prior testing or a current transcript and are in good standing at the institution.

For Sections G, H, I, and J, documents copied and pasted into emails or Word will not be accepted. Documents must be printed directly from the student's Banner account.

K. Additionally, the policies contained in Exhibit A (“WorkSource Atlanta Individual Training Account (ITA) Policies”) and Exhibit B (“WorkSource Atlanta Financial Aid Coordination and PELL/HOPE Policy”), attached hereto, shall apply to those students applying for pick-up funding.
Exhibit A

WorkSource Atlanta Individual Training Account (ITA) Policies

An adult or dislocated worker determined eligible for WIOA funded services may select a provider from the State ETPL after consultation with a WIOA career advisor. If a customer receives career advisement and support services and the program of study is funded by Pell/HOPE funds, the ITA policies will apply.

A. Training must be in occupations identified in the local WIOA Plan as growth occupations or documentation of employment prospects for areas not listed in the plan should be provided. Regional Demand Occupations are included as Exhibit C.

B. Training must result in wages sufficient to attain self-sufficiency without aid of public assistance.

C. Training must be full-time status (as defined by the institution) to accommodate existing Unemployment Insurance requirements. Exceptions may be approved on a case-by-case basis.

D. Programs should not exceed 104 weeks (two years).

1. Applicants must be fully accepted into the specific occupational skills training program of their choice.

2. It is the general rule to provide assistance during the specific program of study, rather than prerequisite courses. Some technical colleges provide a healthcare technologies program. This usually covers the required pre-requisites for more advanced healthcare training such as nursing, radiology technology, dental hygiene, etc. The general health technology program is not considered program acceptance for WIOA because it does not prepare a student upon completion to begin a specific career. Rather it prepares a student to enter the specific advanced healthcare training.

3. For extremely competitive program acceptance such as nursing, radiology technology and dental hygienist, customers must select an alternative to the general health technologies program in order to receive program funding. For example, acceptance to an Associate of Science Nursing degree program would be acceptable.

4. Degree/certificate program may include courses from an approved core of general education (i.e., math and English) required for degree/certificate. WIOA funding can be used for core in these cases.

5. Pre-requisites or developmental studies are not considered core and no WIOA
funding will be provided. WIOA funding will be provided when the student has received formal acceptance into a career program.

6. Exceptions to this policy may be approved on a case-by-case basis and requests should include evidence that financial support is available during extended training periods.

7. Extended critical shortage healthcare curricula will be reviewed and approved on a case-by-case basis. EXCEPTION: Limitations have been increased to four years for graduate degrees for Registered Nurses seeking nursing instructor positions at universities and technical colleges. Applicants with non-medical baccalaureate degrees will be considered for accelerated Registered Nursing Master’s level programs at Regents Schools.

E. In general, all training programs must be within a reasonable commute of the WIOA local area that may include out-of-area and out-of-state training institutions. Out-of-area training programs that are not within commuting distance to the WIOA local area may be approved on a case-by-case basis. All approved training must be located within the contiguous United States.

F. All applicants must apply for the Pell Grant and/or HOPE Scholarship program, if eligible. Pell funds may be combined with WIOA funds to cover total expenses.

G. WIOA funding may be provided for college level and post baccalaureate instruction only if all of the following conditions have been met:

1. The customer must be accepted into a certificate or degree program, and the course of study must be occupation-specific (i.e., radiology technician, accounting, teacher certification), or the customer is a Registered Nurse seeking a graduate degree in Nursing to fill a vacant instructor position at a university or technical college. No funds shall be provided for general academic programs (General Academic Studies, Bachelor of Business Administration, Bachelor of Art, etc.).

2. Total course of study will take no longer than 104 weeks (2 years) to complete and be a certificate, diploma or degree program. Extended critical shortage healthcare curricula will be reviewed and approved on a case-by-case basis.

3. The customer must demonstrate that he/she has the financial resources to attend long-term training.

H. Continuing Education and other similar courses will be approved if the following conditions apply:

1. The customer must have a specific occupational goal.
2. The customer must present evidence describing how the proposed training will increase his/her employment marketability.

I. Short-term vocational services are intended for workers who lack occupational credential/certification and require short-term continuing education offerings to enhance and upgrade skills for certification. Short-term (less than 120 clock hours) training, preparation, and review activities which prepare customers to sit for certification examination courses may be provided as an Individualized Service rather than an ITA.

J. ITAs may be utilized for expenses related to training, including but not limited to the following: books, tuition and fees, supplies, tools, uniforms and shoes, certification, licensing, testing fees, drug testing and background testing for entrance into training, medical requirements for training entrance and such items as specifically required for a course or program.

1. The following items are not provided by ITAs: computers, computer equipment, computer program software, peripherals, electronic and wireless equipment.

K. ITAs will not be used for payment of late fees caused by customer error or delay. The customer will be responsible for these fees, as he/she is responsible for other fines or penalties.

L. Training limitations follows:

1. Up to $7,000 in training costs, excluding support, may be expended for each participant for up to one year of training, which is defined as up to 52 calendar weeks from the initial start date of training. The limit of $7,000 applies in circumstances where training is designed to be completed in 52 weeks or less, even if the customer is unable to complete training under the usual program training schedule.

2. Up to $10,000 in training costs, excluding support, may be expended for each participant for up to two years of training. No more than $7,000 will be provided towards training costs during any one 52 calendar week period as noted above.
Agenda Section VII.

Action Item

Records Retention Policy
Records Retention

I. Purpose
WorkSource Atlanta’s Records Retention policy provides guidance for proper maintenance of financial and programmatic records. These records must be accessible to authorized Federal, State, and Local oversight staff and verifiable for monitoring, reporting, audit, and evaluation.

II. Effective Date
November 21, 2019

III. Length of Record Retention
For both Grantees and Service Providers, records (including all financial and programmatic records, supporting documents, statistical records, and other records of grantees or subgrantees) must be retained for three (3) years following the date on which the expenditures report containing the final expenditures (closeout) charged to a program year’s allotment or a grant is accepted by the Technical College System of Georgia’s Office of Workforce Development (OWD). (2 CFR §200.333, 29 CFR §97.42)

Each recipient must maintain the following records, including records of applicants, registrants, eligible applicants/registrants, participants, terminées, employees, and applicants for employment for a period of not less than three (3) years from the expenditure report containing the final expenditures (closeout) charged to a program year’s allotment or a grant is accepted by OWD. (29 CFR §38.43)

The record retention period does not start over if final expenditure reports are revised, if these revisions are for the following reasons:

A. Revisions resulting from closeout are considered expenditure adjustments and do not alter the initial time period for retention. The records must be retained for three (3) years from the original submission date of the final expenditure report.

B. Revisions resulting from litigation, audit/audit resolution, or claims

C. If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

D. In some cases, recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity’s fiscal year in which the program income is earned.
IV. **Other Retention Regulations**

A. Real property and equipment records must be retained for three (3) years after final disposition of the property.

B. Actions related to resolving complaints shall be maintained for not less than three years from the date of resolving the complaint. In addition, WIOA grantees and service providers must follow the requirements of 2 C.F.R. § 200.333 and 29 CFR 38.43, as these regulations apply to the entire organization receiving WIOA funds. These records should be maintained as a whole record system.

C. Litigation and audit records must be retained beyond the prescribed period if any litigation or audit has begun, or if a claim is initiated involving the grant or agreement covered by the records. The records must be retained until resolution of the litigation, audit, or claim and final action is taken; or until the end of the regular 3-year record retention, whichever is longer.

D. A failure to obtain and audit extends the record retention requirement indefinitely. A delay in obtaining an audit or in resolving audit findings extends the record retention period until all audit requirements have been satisfied and all findings have been resolved the satisfaction of the awarding agency.

E. Computations or proposals, cost allocation plans, and supporting documentation and records must be retained for three (3) years from the date the indirect cost rate package is submitted for negotiation. If not submitted for negotiation, the records must be maintained for three years from the end of the Program Year that contains the final grant costs.

V. **Records Storage**

Records shall be retained and stored in a manner that will preserve their integrity and admissibility as evidence in any audit/litigation or other proceeding. Microfilmed or photocopied records can be substituted for original records because they are generally accepted as admissible for evidentiary purposes. The burden of production and authentication of the records shall be on the custodian of the records. Failure to authenticate records will deny the custodian the right to use it.

When no litigation, claim, negotiation, audit, or other action is pending and when grant expiration dates (per local grant agreements) are within the normal two-year life cycle of the grant, the below guidelines may be used. It is recommended that customer files be alphabetized and placed in banker’s boxes with a copy of the report taped to the lid of the box. Boxes should be clearly marked by Program Year and stored in a secure location.

VI. **WorkSource Atlanta Staff**

As of January 7, 2019, all WorkSource Atlanta human resources, finance, and procurement documents are uploaded and stored to ATLCloud, the City of Atlanta’s cloud-based network and storage system. They are available for access by Federal, State, and Local oversight staff.
The City of Atlanta Outlook365 program automatically stores all employee emails, which are archived for five years on the Outlook365 network. They are available for access by Federal, State, and Local oversight staff.

All electronically created documents (e.g. Word, Excel, PowerPoint, etc.) are uploaded and stored on the City of Atlanta’s Outlook365 OneDrive. They are available for access by Federal, State, and Local oversight staff.

When an employee is separating from employment with WorkSource Atlanta, whether for cause or not for cause, the employee’s access to WorkSource Atlanta’s Information Technology systems, applications and connectivity is rescinded. Individuals will be required to relinquish possession of cell phones, laptops, and any other communication devices. This action is effective immediately on the day of resignation or termination.

VII. Termination of Relationship
When the relation with an LWDA fiscal agent service provider is terminated, the service provider’s fiscal agent’s responsibility for maintenance and retention of records does not end. OWD may want to take physical custody of the records to assure that they are available if needed in instances where the subgrantee is unable to physically retain them.

VIII. References
The citations listed below apply equally to grantees and subgrantees and include financial and program records, supporting documents, statistical records, and other records that are either required to be held by regulation or grant agreement or could reasonably be considered as pertinent to regulation or the grant agreement.

− 2 CFR § 200.333 applies uniformly to all grantees and subgrantees for grants awarded on or after December 26th, 2014.
− 29 CFR §38.43
− 29 CFR §97.42
Agenda Section VII.

Action Item

Secondary Review Policy
Customer Service Continuum

I. Purpose
WorkSource Atlanta’s (“WSA”) customer service continuum policy ensures the delivery of efficient and effective employment and training services and the provision of resources in compliance with the Workforce Innovation and Opportunity Act (WIOA).

II. Effective Date
November 18, 2015

III. Revised
November 21, 2019

IV. Background
WIOA establishes general and specific program eligibility criteria. As recipients of WIOA Title I, Subtitle B grant funding, WSA is required to maintain and report accurate program information. In addition, the Technical College System of Georgia, Office of Workforce Development (OWD) has issued specific guidance for customer eligibility.

V. Requirements
WIOA requires Local Workforce Development Areas (LWDAs) to verify or confirm eligibility requirements through an examination of documents. Documentation requirements and eligibility are tied to the level of services provided to the participant.

Participant records must be kept for a minimum of three (3) years.

VI. Secondary Review of Participant Files
A secondary review of participant files conducted by someone other than the original eligibility staff will serve as an internal review process. The second review will ensure eligibility was properly determined, correct and complete.

Eligibility file checklists (see Attachments C, D, E, and F) will require the signature and date of the second reviewer. The signed and dated second reviewer checklist will be uploaded to the participant’s WorkSource Portal file.

Any changes made to the information that was used to determine eligibility must be accompanied by a case note. The case note must indicate the reason(s) for the change.

VII. Description
Incorporating both federal and state regulations, this policy provides the step-by step multi-stage eligibility verification process whereby customers receive delivery of services, as
well as the types of acceptable documentation that must be provided in order for participants to enroll in WIOA adult, dislocated worker, and youth programs.

Through implementation of the customer service continuum policy, required documentation is verified and re-verified at each stage of the customer service delivery process.

To ensure that residents of Atlanta receive efficient, high quality employment and training services and the provision of proper resources, WSA will serve its customers by developing them through this continuum of service. The sequence of service starts at outreach and continues through education, intake and assessment, skills development, job placement, supportive services, and follow-up.

WSA Customer Service Continuum.

![WSA Customer Service Continuum Diagram]

**Outreach and education** includes all outreach and partnerships with external agencies, marketing to the public, and work readiness education.

**Intake and assessment** includes the eligibility determination and secondary participant file review process for WIOA programs and services, and objective assessments for career readiness.

**Skills development** includes the career planning, assessment of barriers, and distribution of individual training accounts (ITAs).

**Job-based training and placement** includes the development of a demand-driven, workforce-training plan, the use of labor market analysis to recruit businesses, and subsidies for wages through the On-the-Job Training program and Work Experience program.

**Supportive services** include the dispersal of grant money to remove or reduce barriers to training and employment, and the referral of WIOA customers to external agencies for assistance.

**Follow-up Services** are services that are provided to adult and dislocated worker participants who enter employment and all youth participants after exiting their WIOA enrollment.
Follow-up activities are conducted to ensure positive outcomes and to give credit for outcomes. Obtaining supplemental data to determine if the individual is employed in the four (4) calendar quarters following exit to unsubsidized employment is a follow-up activity.

Follow-up must occur during the quarter being recorded.

A. Timelines for Quarterly Follow-Up

i. The first quarter follow-up should be done during the calendar quarter after the participant exits from WIOA programs.

ii. Calendar quarters:
   a. January-March
   b. April-June
   c. July-September
   d. October-December

iii. Example: If a participant exited June 30, 2018, follow-up would be done according to the following calendar quarters:
    a. 1st Quarter: July – September 2018
    b. 2nd Quarter: October – December 2018
    c. 3rd Quarter: January – March 2019
    d. 4th Quarter: April – June 2019

iv. Example: If a participant exited December 3, 2018, follow-up would be done according to the following calendar quarters:
    a. 1st Quarter: January – March 2019
    b. 2nd Quarter: April – June 2019
    c. 3rd Quarter: July – September 2019
    d. 4th Quarter: October- December 2019

B. As per USDOL Common Measures policy (see TEGL 17-05, dated 2/17/06), allowable sources of supplemental information for tracking employment-related outcomes include case management notes, automated data base systems, documented contacts with employers, and participant surveys. LWDAs must keep in mind that all supplemental data and methods are to be documented and are subject to audit.
V. References
  – Workforce Innovation and Opportunity Act, Pub. L. 113-128
  – TEGL 17-05
  – Technical College System of Georgia, Office of Workforce Development Policies and Procedures Manual, Section 3.2

VI. Attachments
  – Attachment A: Customer Service Continuum Step-by-Step Narrative
  – Attachment B: Eligibility Documentation Guide for WIOA Programs
  – Attachment C: Initial Eligibility and Secondary Review Checklist_Adult
  – Attachment D: Initial Eligibility and Secondary Review Checklist_DW
  – Attachment E: Initial Eligibility and Secondary Review Checklist_ISY
  – Attachment F: Initial Eligibility and Secondary Review Checklist_OSY
  – Attachment G: Customer Service Continuum Process Maps
## Initial Eligibility and Secondary Review

**WorkSource Atlanta Adult Document Checklist**

1. **Citizenship/Work Status:** Either ONE document from List “A” OR ONE document from List “B” AND List “C.”

   **List A** (Proves citizenship AND employment eligibility)
   - U.S. Passport
   - Unexpired Foreign Passport w/ I-551 Stamp
   - Permanent Resident Alien Card
   - Registration Receipt Card
   - Unexpired Employment Authorization Document

   OR

   **List B** (Proves citizenship)
   - Valid Driver’s License
   - State ID
   - U.S. Military ID
   - Native American Tribal Document
   - Voter Registration Card

   Individuals under age 18 may provide either a school record, school report card, clinic record, doctor record, hospital record, day care record, or nursery record

   **List C** (Proves employment eligibility)
   - Birth Certificate
   - Social Security card
   - Valid I-197
   - US Citizen ID Card (INS Form I-179)
   - Native American Tribal Document
   - Certificate of Birth Abroad (Form FS-545 or Form DS-1350)
   - Department of Homeland Security Employment Authorization Card

2. **Proof of Age/DOB**

3. **Proof of SS#**

4. **Proof of Residency**

5. **Proof of Selective Service Registration** (Males Only)

   - Baptismal Certificate
   - Birth Certificate
   - DACA Work Permit
   - DD-214 / Military ID
   - Driver’s License / State ID
   - INS Document/Passport
   - Public Assistance Records
   - School Record or ID
   - DD-214
   - Pay Stub
   - Public Assistance Records
   - Social Security Card
   - W2 Statement
   - Property Tax Bill
   - Current Utility Bill
   - Car Insurance Policy
   - Public Assistance Records
   - Driver’s License
   - Letter from Homeless Shelter
   - Notarized Self-Attestation
   - Rental Contract
   - Refugee Address Verification Affidavit (Form DS-20)
   - Acknowledgement Letter
   - Form DD-214
   - Form 3A
   - Stamped Receipt of Registration Card
   - Verification Form
   - Status Information Letter
   - Or check status at: [https://www.sss.gov/Home/Verification](https://www.sss.gov/Home/Verification)

6. **Proof of Low-Income Status**

   **Proof of Public Assistance** (If you receive public assistance, you automatically meet income eligibility)

   **Documentation (Provide one document listed below)**
   - Letter of Authorization to receive TANF from DFACS
   - Letter of Authorization to receive SSDI from SSA
   - Letter of Authorization to Receive SNAP (Food Stamps) from DFACS
   - Letter of Authorization for Housing Voucher (AHA)

   **Proof of Income** (If you do not receive public assistance, you must show annualized income AND family size)

   **Annualized Family Income** (Provide one document listed below)
   - Alimony Agreement
   - Veteran’s Administration Award letter
   - Bank Statements or Financial Records
   - Pay Stubs
   - Pension/Annuity Statement
   - Public Assistance Verification
   - Social Security Benefits Letter
   - Unemployment Insurance documents
   - Worker’s Compensation
   - Self-Attestation

   **Family Size** (Provide one document listed below)
   - Most recent tax return
   - Documentation from Atlanta Housing Authority/Housing Choice Voucher Program
   - Lease/Rental Contract

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Initial Eligibility and Secondary Review_Adult
8. ADDITIONAL REQUIRED DOCUMENTS

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<thead>
<tr>
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<td>WIOA Application_Signed</td>
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9. SIGNATURES AND ELIGIBILITY DETERMINATION

The signatures below confirm that the eligibility application is complete and required documentation listed on this form is included in the participant’s WorkSource Portal file.

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<th>Authorization Type</th>
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<tr>
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818 Pollard Boulevard, SW, Atlanta, GA 30315 | 404-546-3000 | WorkSourceAtlanta.org
An Equal Opportunity Employer/Program | TTY/TDD: 1-800-255-0135 or Mobile Device Dial: 711

Initial Eligibility and Secondary Review_Adult
Applicant Name:  
Last 4 SSN#:  
Email:  
Phone #:

INITIAL ELIGIBILITY AND SECONDARY REVIEW
WORKSOURCE ATLANTA DISLOCATED WORKER DOCUMENT CHECKLIST


**LIST A (Proves citizenship AND employment eligibility)**
- [ ] U.S. Passport
- [ ] Unexpired Foreign Passport w/ I-551 Stamp
- [ ] Permanent Resident Alien Card
- [ ] Registration Receipt Card
- [ ] Unexpired Employment Authorization Document

OR

**LIST B (Proves citizenship)**
- [ ] Valid Driver’s License
- [ ] State ID
- [ ] U.S. Military ID
- [ ] Native American Tribal Document
- [ ] Voter Registration Card
- [ ] Individuals under age 18 may provide either a school record, school report card, clinic record, doctor record, hospital record, day care record, or nursery record

AND

**LIST C (Proves employment eligibility)**
- [ ] Birth Certificate
- [ ] Social Security card
- [ ] Valid I-97
- [ ] US Citizen ID Card (INS Form I-179)
- [ ] Native American Tribal Document
- [ ] Certificate of Birth Abroad (Form FS-545 or Form DS-1350)
- [ ] Department of Homeland Security Employment Authorization Card

2. PROOF OF AGE/DOB
3. PROOF OF SS#
4. PROOF OF RESIDENCY
5. PROOF OF SELECTIVE SERVICE REGISTRATION (Males Only)

**6. DISLOCATED WORKER STATUS (Must provide date of dislocation)**

**Category 1: Terminated or Laid Off, or Notice of Termination or Layoff**
- [ ] Separation Notice/Layoff Letter
- [ ] Employer Letter or Notice
- [ ] UI Determination
- [ ] WARN Notice with Name Listed

**Category 2: Plant Closure/Mass Layoff**
- [ ] Separation Notice/Layoff Letter
- [ ] Employer Letter or Notice
- [ ] UI Determination
- [ ] WARN Notice/Name Listed
- [ ] News Article

**Category 3: Self-Employed**
- [ ] Notice of Foreclosure
- [ ] Entry of Bankruptcy Proceedings
- [ ] Inability to Pay Loans
- [ ] Inability to Obtain Capital to Continue Operations
- [ ] Proof of Insolvency

**Category 4: Displaced Homemaker**
- [ ] Court Records
- [ ] Divorce Documents
- [ ] Bank Records
- [ ] Public Assistance Records
- [ ] Spouse’s Layoff Notice
- [ ] Spouse’s Death Record

**Category 5: Military Spouse**
- [ ] DD 214 if dislocation is based on discharge from the military
- [ ] Military orders showing change of military station

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An Equal Opportunity Employer/Program | TTY/TDD: 1-800-255-0135 or Mobile Device Dial: 711

Initial Eligibility and Secondary Review_DW
8. ADDITIONAL REQUIRED DOCUMENTS

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</tr>
<tr>
<td>SAVE Form</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

9. SIGNATURES AND ELIGIBILITY DETERMINATION

The signatures below confirm that the eligibility application is complete and required documentation listed on this form is included in the participant's WorkSource Portal file.

<table>
<thead>
<tr>
<th>Original Eligibility Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Date:</td>
</tr>
<tr>
<td>Print Name:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Secondary Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Date:</td>
</tr>
<tr>
<td>Print Name:</td>
</tr>
</tbody>
</table>
INITIAL ELIGIBILITY AND SECONDARY REVIEW
WORKSOURCE ATLANTA IN-SCHOOL YOUTH (ISY) DOCUMENT CHECKLIST

An In-School Youth is an individual who: (1) is attending school, (2) is not younger than 14 or not older than 21, (3) is low-income, and (4) has at least one of the employment challenges listed in Section 7.


<table>
<thead>
<tr>
<th>LIST A (Proves citizenship AND employment eligibility)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ U.S. Passport ☐ Unexpired Foreign Passport w/ I-551 Stamp ☐ Permanent Resident Alien Card</td>
</tr>
<tr>
<td>☐ Registration Receipt Card ☐ Unexpired Employment Authorization Document</td>
</tr>
</tbody>
</table>

OR

<table>
<thead>
<tr>
<th>LIST B (Proves citizenship)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Valid Driver’s License ☐ State ID ☐ U.S. Military ID ☐ Native American Tribal Document</td>
</tr>
<tr>
<td>☐ Voter Registration Card ☐ Individuals under age 18 may provide either a school record, school report card, clinic record, doctor record, hospital record, day care record, or nursery record</td>
</tr>
</tbody>
</table>

AND

<table>
<thead>
<tr>
<th>LIST C (Proves employment eligibility)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Birth Certificate ☐ Social Security card ☐ Valid I-197 ☐ US Citizen ID Card (INS Form I-179)</td>
</tr>
<tr>
<td>☐ Native American Tribal Document ☐ Certificate of Birth Abroad (Form FS-545 of Form DS-1350)</td>
</tr>
<tr>
<td>☐ Department of Homeland Security Employment Authorization Card</td>
</tr>
</tbody>
</table>

2. PROOF OF AGE/DOB

<table>
<thead>
<tr>
<th>3. PROOF OF SS#</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Baptismal Certificate</td>
</tr>
<tr>
<td>☐ Birth Certificate</td>
</tr>
<tr>
<td>☐ DACA Work Permit</td>
</tr>
<tr>
<td>☐ DD-214 / Military ID</td>
</tr>
<tr>
<td>☐ Driver’s License / State ID</td>
</tr>
<tr>
<td>☐ INS Document/Passport</td>
</tr>
<tr>
<td>☐ Public Assistance Records</td>
</tr>
<tr>
<td>☐ School Record or ID</td>
</tr>
<tr>
<td>☐ DD-214</td>
</tr>
<tr>
<td>☐ Pay Stub</td>
</tr>
<tr>
<td>☐ Public Assistance Records</td>
</tr>
<tr>
<td>☐ Social Security Card</td>
</tr>
<tr>
<td>☐ UI Wage Record</td>
</tr>
<tr>
<td>☐ W-2 Statement</td>
</tr>
</tbody>
</table>

4. PROOF OF RESIDENCY

| ☐ Property Tax Bill |
| ☐ Current Utility Bill |
| ☐ Car Insurance Policy |
| ☐ Public Assistance Records |
| ☐ Driver’s License |
| ☐ Letter from Homeless Shelter |
| ☐ Notarized Self-Attestation. |
| ☐ Rental Contract |
| ☐ Refugee Address Verification Affidavit (Form DS-20) |
| ☐ Acknowledgement Letter |
| ☐ Form DD-214 |
| ☐ Form 3A |
| ☐ Stamped Receipt of Registration Card |
| ☐ Verification Form |
| ☐ Status Information Letter |
| ☐ Or check status at: https://www.sss.gov/Home/Verification |

5. PROOF OF SELECTIVE SERVICE REGISTRATION (Males Only)

| ☐ Letter or other documentation from school system or counselor to parent/guardian |
| ☐ School records |
| ☐ Notarized self-attestation |

6. PROOF OF SCHOOL ATTENDANCE

<table>
<thead>
<tr>
<th>DOCUMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Letter or other documentation from school system or counselor to parent/guardian</td>
</tr>
<tr>
<td>☐ School records</td>
</tr>
<tr>
<td>☐ Notarized self-attestation</td>
</tr>
</tbody>
</table>
## 7. PROOF OF LOW-INCOME STATUS AND CHALLENGES TO EMPLOYMENT
### 7A. CHALLENGES TO EMPLOYMENT REQUIRE PROOF OF LOW-INCOME (Please see Section 7B for Low-Income Requirements)

<table>
<thead>
<tr>
<th><strong>DOCUMENTATION</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Letter from drug or alcohol rehab agency</td>
</tr>
<tr>
<td>□ Medical records</td>
</tr>
<tr>
<td>□ Physician’s statement</td>
</tr>
<tr>
<td>□ Psychiatrist’s diagnosis</td>
</tr>
<tr>
<td>□ Psychologist’s diagnosis</td>
</tr>
<tr>
<td>□ Rehabilitation evaluation</td>
</tr>
<tr>
<td>□ Sheltered workshop certification</td>
</tr>
<tr>
<td>□ Social Services records/referral</td>
</tr>
<tr>
<td>□ Social Security Administration disability records</td>
</tr>
<tr>
<td>□ Veteran’s Administration letter/records</td>
</tr>
<tr>
<td>□ Vocational Rehabilitation letter</td>
</tr>
<tr>
<td>□ Worker’s Compensation record</td>
</tr>
<tr>
<td>□ Disability Employment Initiative (DEI) statement</td>
</tr>
<tr>
<td>□ School records (e.g. IEP signed by school representative)</td>
</tr>
<tr>
<td>□ Self-attestation in extreme circumstances</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Individual with a Disability</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Court documents</td>
</tr>
<tr>
<td>□ Statement from halfway house</td>
</tr>
<tr>
<td>□ Letter of parole</td>
</tr>
<tr>
<td>□ Letter from probation officer</td>
</tr>
<tr>
<td>□ Police record</td>
</tr>
<tr>
<td>□ Letter from Dept. of Juvenile Justice</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>An individual subject to juvenile or adult justice system</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Written statement from a shelter</td>
</tr>
<tr>
<td>□ Written statement from individual/agency providing residence</td>
</tr>
<tr>
<td>□ Written statement from social service agency</td>
</tr>
<tr>
<td>□ Notarized self-attestation</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Homeless, Runaway, In Foster Care, or Aged Out of Foster Care</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Birth certificate of child</td>
</tr>
<tr>
<td>□ Hospital certificate of birth of child</td>
</tr>
<tr>
<td>□ Medical card</td>
</tr>
<tr>
<td>□ Physician’s note</td>
</tr>
<tr>
<td>□ Referral from official agency</td>
</tr>
<tr>
<td>□ Verified school program for pregnant/parenting youth</td>
</tr>
<tr>
<td>□ School records</td>
</tr>
<tr>
<td>□ Signed statement from Social Service agency</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Pregnant/Parenting</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Assessed by generally accepted standardized test</td>
</tr>
<tr>
<td>□ School records (e.g. transcript, IEP signed by school representative)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Basic Skills Deficient</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Standardized tests</td>
</tr>
<tr>
<td>□ School records</td>
</tr>
<tr>
<td>□ Other ESL provider (e.g. refugee resettlement agency, community-based organization, faith-based organization, etc.)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>English Language Learner</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Signed statements/forms from Atlanta police Department.</td>
</tr>
<tr>
<td>□ Court documents.</td>
</tr>
<tr>
<td>□ Police records.</td>
</tr>
<tr>
<td>□ School records.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Requires additional assistance to enter or complete an educational program or secure/hold employment, which includes:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Self-attestation in extreme circumstances</td>
</tr>
<tr>
<td>□ Written statement from a shelter</td>
</tr>
<tr>
<td>□ Written statement from individual/agency providing residence</td>
</tr>
<tr>
<td>□ Written statement from social service agency</td>
</tr>
<tr>
<td>□ Notarized self-attestation</td>
</tr>
</tbody>
</table>

---

Initial Eligibility and Secondary Review, ISY
Applicant Name: & Last 4 SSN#:
Email: & Phone #:

- Unemployed for the last six months.
- Left employment at least three times over the last year.
- Requests assistance in attending public or private alternative education institutions which are designed to serve community youth who are deemed at risk, are not allowed in mainstream institutions, or who have been determined by the community as needing special attention.
- A referral from the Atlanta Police Department.
- A youth residing in an area identified as high-risk for gang activity and recruitment.
- A youth of incarcerated parent(s).
- A youth who currently has a substance abuse problem and/or a history of having a substance abuse problem.

7C. PROOF OF LOW-INCOME

<table>
<thead>
<tr>
<th>DOCUMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temporary Assistance for Needy Families (TANF) - Receives, or a member of a family that receives, cash payments under the TANF, a Federal income-based public assistance program.</td>
</tr>
<tr>
<td>□ Signed statements/forms from DFCS verifying current TANF benefits.</td>
</tr>
<tr>
<td>□ Copy of authorization to receive TANF.</td>
</tr>
<tr>
<td>□ Copy of TANF check or bank statement showing direct deposit.</td>
</tr>
<tr>
<td>□ Letter of TANF acceptance from DFCS.</td>
</tr>
<tr>
<td>□ Current TANF ID card showing cash grant assistance.</td>
</tr>
<tr>
<td>□ DFCS/TANF records/printout.</td>
</tr>
</tbody>
</table>

Supplemental Nutrition Assistance Program (SNAP) - Member of a household that receives, or has been determined within last six-months to be eligible for, SNAP.
| □ Signed statements/forms from DFCS verifying current SNAP benefits. |
| □ Copy of authorization to receive SNAP. |
| □ Copy of SNAP check or bank statement showing direct deposit. |
| □ DFCS SNAP acceptance letter. |
| □ Current SNAP ID card showing cash grant assistance. |
| □ DFCS/SNAP records/printout. |

State or Local Income-Based Public Assistance (General Assistance) - Receives, or member of a family that receives, cash payments under a federal, state, or local income-based public assistance program.
<p>| □ Copy of authorization to receive public assistance. |
| □ Copy of public assistance check. |
| □ Medical card showing cash grant status. |
| □ Public assistance ID card showing cash grant assistance. |
| □ Public assistance records/printout. |
| □ Statement from Social Services Agency |
| □ Refugee assistance records. |</p>
<table>
<thead>
<tr>
<th><strong>Refugee Cash Assistance (RCA)/Refugee Medical Assistance (RMA)</strong> - Member of a household that receives, or has been determined within last six-months to be eligible for, RCS/RMA.</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Signed DFCS statements/forms verifying current RCA/RMA benefits.</td>
</tr>
<tr>
<td>- Copy of authorization to receive RCA/RMA.</td>
</tr>
<tr>
<td>- Copy of RCA check or bank statement showing direct deposit.</td>
</tr>
<tr>
<td>- Letter of RCA/RMA acceptance from DFCS.</td>
</tr>
<tr>
<td>- Current RCA/RMA ID card showing cash grant assistance.</td>
</tr>
<tr>
<td>- DFCS/RCA-RMA records/printout.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Supplemental Security Income (SSI)</strong> - Member of a household that receives, or has been determined within last six-months to be eligible to receive, SSI.</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Signed statements/forms from SSA verifying current SSI benefits.</td>
</tr>
<tr>
<td>- Copy of authorization to receive SSI.</td>
</tr>
<tr>
<td>- Copy of SSI check or bank statement showing direct deposit.</td>
</tr>
<tr>
<td>- Letter of SSI acceptance from Social Security Administration.</td>
</tr>
<tr>
<td>- Current SSI ID card showing cash grant assistance.</td>
</tr>
<tr>
<td>- SSA/SSI records/printout.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Youth Living in a High-Poverty Area</strong> - A Census tract, set of contiguous Census tracts, or county that has a poverty rate of at least 25 percent using ACS 5-Year data.</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Print out which illustrates residence within the boundaries of a high-poverty Census tract areas within the City of Atlanta</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Proof of Income</strong> <em>(If not receiving public assistance, annualized income AND family size must be shown)</em></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Annualized Family Income (Provide one document listed below)</strong></td>
</tr>
<tr>
<td>- Alimony Agreement</td>
</tr>
<tr>
<td>- Veteran’s Administration Award letter</td>
</tr>
<tr>
<td>- Bank Statements or Financial Records</td>
</tr>
<tr>
<td>- Pay Stubs</td>
</tr>
<tr>
<td>- Pension/Annuity Statement</td>
</tr>
<tr>
<td>- Public Assistance Verification</td>
</tr>
<tr>
<td>- Social Security Benefits Letter</td>
</tr>
<tr>
<td>- Unemployment Insurance documents</td>
</tr>
<tr>
<td>- Worker’s Compensation</td>
</tr>
<tr>
<td>- Self-Attestation</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Family Size</strong> <em>(Provide one document listed below)</em></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Most recent tax return</td>
</tr>
<tr>
<td>- Documentation from Atlanta Housing Authority/Housing Choice Voucher Program</td>
</tr>
<tr>
<td>- Lease/Rental Contract</td>
</tr>
</tbody>
</table>
## 8. ADDITIONAL REQUIRED DOCUMENTS

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>EO Grievance Notice_Signed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WIOA Application_Signed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAVE Form</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## 9. SIGNATURES AND ELIGIBILITY DETERMINATION

The signatures below confirm that the eligibility application is complete and required documentation listed on this form is included in the participant's WorkSource Portal file.

<table>
<thead>
<tr>
<th>Role</th>
<th>Signature</th>
<th>Date</th>
<th>Print Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Original Eligibility Determination</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Secondary Review</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


INITIAL ELIGIBILITY AND SECONDARY REVIEW
WORKSOURCE ATLANTA OUT-OF-SCHOOL YOUTH (OSY) DOCUMENT CHECKLIST

An Out-of-School Youth is an individual who: (1) must not be attending any school, (2) is not younger than 16 or not older than 24, and (3) have at least one of the employment challenges listed in Section 7.


**LIST A (Proves citizenship AND employment eligibility)**
- U.S. Passport
- Unexpired Foreign Passport w/ I-551 Stamp
- Permanent Resident Alien Card
- Registration Receipt Card
- Unexpired Employment Authorization Document

**OR**

**LIST B (Proves citizenship)**
- Valid Driver’s License
- State ID
- U.S. Military ID
- Native American Tribal Document
- Voter Registration Card
- Individuals under age 18 may provide either a school record, school report card, clinic record, doctor record, hospital record, day care record, or nursery record

**AND**

**LIST C (Proves employment eligibility)**
- Birth Certificate
- Social Security card
- Valid I-197
- US Citizen ID Card (INS Form I-179)
- Native American Tribal Document
- Certificate of Birth Abroad (Form FS-545 of Form DS-1350)
- Department of Homeland Security Employment Authorization Card

2. PROOF OF AGE/DOB
3. PROOF OF SS#
4. PROOF OF RESIDENCY
5. PROOF OF SELECTIVE SERVICE REGISTRATION (Males Only)
6. PROOF OF SCHOOL NON-ATTENDANCE DOCUMENTATION

1. Did not complete school
2. Graduated or attained a Secondary School Diploma or Equivalent, but not currently attending any school
4. Enrolled in YouthBuild
5. Enrolled in Job Corps
6. Enrolled in a high-school equivalency program not through a public K-12 school system (Title 20 CFR Section 681.230)
7. Enrolled in a drop out re-engagement program
8. Enrolled in a charter school exclusively in partnership with WIOA, YouthBuild, Job Corps.

- Baptismal Certificate
- Birth Certificate
- DACA Work Permit
- DD-214 / Military ID
- Driver’s License / State ID
- INS Document/Passport
- Public Assistance Records
- School Record or ID
- DD-214
- Pay Stub
- Public Assistance Records
- Social Security Card
- UI Wage Record
- W-2 Statement
- Property Tax Bill
- Current Utility Bill
- Car Insurance Policy
- Public Assistance Records
- Driver’s License
- Letter from Homeless Shelter
- Notarized Self-Attestation.
- Rental Contract
- Refugee Address Verification Affidavit (Form DS-20)
- Acknowledgement Letter
- Form DD-214
- Form 3A
- Stamped Receipt of Registration Card
- Verification Form
- Status Information Letter
- Or check status at: https://www.sss.gov/Home/Verification

- High School Diploma or GED
- Letter or other documentation from school system
- School records
- Notarized self-attestation
### 7. PROOF OF LOW-INCOME STATUS AND CHALLENGES TO EMPLOYMENT

#### 7A. CHALLENGES TO EMPLOYMENT THAT DO NOT REQUIRE PROOF OF LOW-INCOME STATUS

<table>
<thead>
<tr>
<th>Individual with a Disability</th>
<th>DOCUMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Letter from drug or alcohol rehab agency</td>
<td></td>
</tr>
<tr>
<td>□ Medical records</td>
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<td>□ Physician’s statement</td>
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<tr>
<td>□ Social Security Administration disability records</td>
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<tr>
<td>□ Veteran’s Administration letter/records</td>
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<td>□ Disability Employment Initiative (DEI) statement</td>
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<td>□ School records (e.g. IEP signed by school representative)</td>
<td></td>
</tr>
<tr>
<td>□ Self-attestation in extreme circumstances</td>
<td></td>
</tr>
</tbody>
</table>

#### 7B. CHALLENGES TO EMPLOYMENT THAT REQUIRE PROOF OF LOW-INCOME (Please see Section 7C for Low-Income Requirements)

<table>
<thead>
<tr>
<th>Recipient of High School Diploma and an English Language Learner</th>
<th>DOCUMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Standardized tests</td>
<td></td>
</tr>
<tr>
<td>□ School records</td>
<td></td>
</tr>
<tr>
<td>□ Other ESL provider (e.g. refugee resettlement agency, community-based organization, faith-based organization, etc.)</td>
<td></td>
</tr>
</tbody>
</table>
### Initial Eligibility and Secondary Review

**OSY**

<table>
<thead>
<tr>
<th>Recipient of High School Diploma and Basic Skills Deficient</th>
<th>Assessed by generally accepted standardized test</th>
<th>School records (e.g. transcript, IEP signed by school representative)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requires additional assistance to enter or complete an educational program or secure/hold employment, which includes:</td>
<td>Signed statements/forms from Atlanta police Department.</td>
<td>Court documents.</td>
</tr>
<tr>
<td>- Unemployed for the last six months.</td>
<td>Police records.</td>
<td>School records.</td>
</tr>
<tr>
<td>- Left employment at least three times over the last year.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Requests assistance in attending public or private alternative education institutions which are designed to serve community youth who are deemed at risk, are not allowed in mainstream institutions, or who have been determined by the community as needing special attention.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- A referral from the Atlanta Police Department.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- A youth residing in an area identified as high-risk for gang activity and recruitment.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- A youth of incarcerated parent(s).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- A youth who currently has a substance abuse problem and/or a history of having a substance abuse problem.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 7C. PROOF OF LOW-INCOME

<table>
<thead>
<tr>
<th>Temporary Assistance for Needy Families (TANF) - Receives, or a member of a family that receives, cash payments under the TANF, a Federal income-based public assistance program.</th>
<th>Signed statements/forms from DFCS verifying current TANF benefits.</th>
<th>Copy of authorization to receive TANF.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Copy of TANF check or bank statement showing direct deposit.</td>
<td>Letter of TANF acceptance from DFCS.</td>
</tr>
<tr>
<td></td>
<td>DFCS/TANF records/printout.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supplemental Nutrition Assistance Program (SNAP) - Member of a household that receives, or has been determined within last six-months to be eligible for, SNAP.</th>
<th>Signed statements/forms from DFCS verifying current SNAP benefits.</th>
<th>Copy of authorization to receive SNAP.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Copy of SNAP check or bank statement showing direct deposit.</td>
<td>DFCS SNAP acceptance letter.</td>
</tr>
<tr>
<td></td>
<td>DFCS/SNAP records/printout.</td>
<td></td>
</tr>
</tbody>
</table>

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<thead>
<tr>
<th>State or Local Income-Based Public Assistance (General Assistance) - Receives, or member of a family that receives, cash payments under a federal, state, or local income-based public assistance program.</th>
<th>Copy of authorization to receive public assistance.</th>
<th>Copy of public assistance check.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Medical card showing cash grant status.</td>
<td>Public assistance ID card showing cash grant assistance.</td>
</tr>
<tr>
<td></td>
<td>Statement from Social Services Agency</td>
<td>Refugee assistance records.</td>
</tr>
</tbody>
</table>

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An Equal Opportunity Employer/Program | TTY/TDD: 1-800-255-0135 or Mobile Device Dial: 711

Initial Eligibility and Secondary Review, OSY
Applicant Name: | Last 4 SSN#:  
---|---
Email: | Phone #:  

**Refugee Cash Assistance (RCA)/Refugee Medical Assistance (RMA)** - Member of a household that receives, or has been determined within last six-months to be eligible for, RCS/RMA.

- Signed DFCS statements/forms verifying current RCA/RMA benefits.
- Copy of authorization to receive RCA/RMA.
- Copy of RCA check or bank statement showing direct deposit.
- Letter of RCA/RMA acceptance from DFCS.
- Current RCA/RMA ID card showing cash grant assistance.
- DFCS/RCI-RMA records/printout.

**Supplemental Security Income (SSI)** - Member of a household that receives, or has been determined within last six-months to be eligible to receive, SSI.

- Signed statements/forms from SSA verifying current SSI benefits.
- Copy of authorization to receive SSI.
- Copy of SSI check or bank statement showing direct deposit.
- Letter of SSI acceptance from Social Security Administration.
- Current SSI ID card showing cash grant assistance.
- SSA/SSI records/printout.

**Youth Living in a High-Poverty Area** A Census tract, set of contiguous Census tracts, or county that has a poverty rate of at least 25 percent using ACS 5-Year data.

- Print out which illustrates residence within the boundaries of a high-poverty Census tract areas within the City of Atlanta.

**Proof of Income** *(If not receiving public assistance, annualized income AND family size must be shown)*

- Annualized Family Income (Provide one document listed below)
  - Alimony Agreement
  - Veteran’s Administration Award letter
  - Bank Statements or Financial Records
  - Pay Stubs
  - Pension/Annuity Statement
  - Public Assistance Verification
  - Social Security Benefits Letter
  - Unemployment Insurance documents
  - Worker’s Compensation
  - Self-Attestation

- Family Size (Provide one document listed below)
  - Most recent tax return
  - Documentation from Atlanta Housing Authority/Housing Choice Voucher Program
  - Lease/Rental Contract

**8. ADDITIONAL REQUIRED DOCUMENTS**

<table>
<thead>
<tr>
<th>EO Grievance Notice_Signed</th>
<th>Yes___</th>
<th>No___</th>
</tr>
</thead>
<tbody>
<tr>
<td>WIOA Application_Signed</td>
<td>Yes___</td>
<td>No___</td>
</tr>
<tr>
<td>SAVE Form</td>
<td>Yes___</td>
<td>No___</td>
</tr>
</tbody>
</table>

Initial Eligibility and Secondary Review_OSY
<table>
<thead>
<tr>
<th>9. SIGNATURES AND ELIGIBILITY DETERMINATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>The signatures below confirm that the eligibility application is complete and required documentation listed on this form is included in the participant's WorkSource Portal file.</td>
</tr>
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</table>

<table>
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<tr>
<th>Original Eligibility Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
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<tr>
<td>Date:</td>
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<tr>
<td>Print Name:</td>
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<table>
<thead>
<tr>
<th>Secondary Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
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<tr>
<td>Date:</td>
</tr>
<tr>
<td>Print Name:</td>
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</tbody>
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Initial Eligibility and Secondary Review_OSY
Agenda Section VII.

Action Item

Selective Service Policy
Selective Service Policy

I. Purpose
The purpose of this policy is to establish a local process for Selective Service registration, documentation requirements, and the guidance for males who have not registered in the required timeframe.

II. Effective Date
November 18, 2015

III. Revised
November 21, 2019

III. Background
Male participants in any program or activity established under WIOA Title I or receiving any assistance or benefit under this title must not have violated Section 3 of the Military Selective Service Act (50 U.S.C. App. 453) by not presenting and submitting to registration as required pursuant to such section (see WIOA Section 189(h)).

WorkSource Atlanta’s Eligibility and Determination Guide will be updated by adding the Appendices below.

Appendix D: Selective Service Requirements

1) Men born on or after January 1, 1960 are required to register with Selective Service within 30 days of their 18th birthday (i.e. 30 days before or 30 days after their birthday.) This includes males who are:
   a. Citizens of the United States; or
   b. Non-citizens, including illegal aliens, legal permanent residents, seasonal agricultural workers, and refugees, who take up residency in the U.S. before their 26th birthday and/or;
   c. Dual nationals of the United States and another country regardless of whether they live in the U.S.

2) Selective Service registration is not required of U.S. citizens if the male falls within one of the following categories:
   i. Men who are serving in the military on full-time active duty;
   ii. Men attending the service academies;
   iii. Disabled men who are continually confined to a residence, hospital or institution; and/or
   iv. Men who are hospitalized, institutionalized, or incarcerated are not required to register during their confinement; however, they must register within 30 days after being released if they have not yet reached their 26th birthday.

3) Selective Service registration is not required of non-U.S. citizens if the male falls within one of the following categories:
a. Non-U.S. male who came into this country for the first time after his 26th birthday. Acceptable forms of supporting documentation include:
   i. Date of entry stamp in his passport;
   ii. I-94 with date of entry stamp on it; or
   iii. Letter from the U.S. Citizenship and Immigration Services (USCIS) indicating the date the man entered the United States presented in conjunction with documentation establishing the individual’s age.

b. Non-U.S. male who entered the U.S. illegally after his 26th birthday. He must provide proof that he was not living in the U.S. from age 18 through 25.

c. Non-U.S. male on a valid non-immigrant visa.

Appendix E: Lack of Selective Service Requirements

1) Registration Requirements for Males Under 26
   Before being enrolled in WIOA Title I-funded services, all males who are not registered with the Selective Service and have not reached their 26th birthday must register through the Selective Service website at www.sss.gov.

   If a male turns 18 while participating in any applicable services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I-funded services.

   If a man under the age of 26 refuses to register with the Selective Service, WIOA Title I-funded services must be suspended until he registers.

2) Registration Requirements for Males 26 Years and Over
   Before enrolling in WIOA Title I-funded services, all males, 26 years of age or older, must provide:
   i. documentation of compliance with the Selective Service registration requirement;
   ii. documentation showing they were not required to register; or
   iii. if they were required to but did not register, documentation establishing that their failure to register was not knowing and willful.

3) Requesting a Status Information Letter.
   Individuals who failed to comply with the Selective Service registration requirement, must request a Status Information Letter before making a determination that the failure to register was knowing and willful.

   An individual should obtain a Status Information Letter from Selective Service if he
   i. believes he was not required to register; or
   ii. did register but cannot provide the required WIOA eligibility documentation.

If the Status Information Letter indicates that an individual was not required to register for the Selective Service, then he is eligible to enroll in services authorized or funded by Title I of WIOA.

If the Status Information Letter indicates that the individual was required to and did not register, he is presumed to be disqualified from participation in WIOA Title I-funded activities and services until it can be determined that his failure to register was not knowing and willful.

4) Determining Knowing and Willful Failure to Register.

If the individual was required but failed to register with the Selective Service as determined by the Status Information Letter or by his own acknowledgment, the individual may only receive services if he can establish by a preponderance of the evidence that the failure to register was not knowing and willful.

The Lack of Selective Service Registration Letter will be provided by the Skills Development Advisor to the customer informing him that a detailed letter accompanied by appropriate documentation regarding why he believes his failure to register with Selective Service before the age of 26 was neither knowing nor willful.

Within ten (10) days of WorkSource Atlanta’s receipt of the customer’s letter of explanation, a final determination of his eligibility will be issued via U.S. Mail or email.

The individual will need to describe, in detail, the circumstances that prevented him from registering (e.g., hospitalization, institutionalization, incarceration, and/or military service from age 18 through 25) and provide documentation of those circumstances. The documentation should be specific as to the dates of the circumstances.

Evidence presented may include the individual’s written explanation and supporting documentation of his circumstances at the time of the required registration and the reasons for failure to register. The individual should be encouraged to offer as much evidence and in as much detail as possible to support his case.

The following are examples of documentation that may be of assistance in making a determination in these cases:

- Service in Armed Forces. Evidence that a man has served honorably in the U.S. Armed Forces such as DD Form 214 or his Honorable Discharge Certificate. Such documents may be considered sufficient evidence that his failure to register was not willful or knowing.

- Third Party Affidavits. Affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering, may also be helpful to grantees in making determinations in cases regarding willful and knowing failure to register.

If it is determined that the failure to register was not knowing and willful and the individual is otherwise eligible, services may be provided.

If it is determined that the failure to register was knowing and willful, services must be denied.
Agenda Section VII.
Action Item
Subrecipient Monitoring Policy
Subrecipient Monitoring

I. Purpose
The purpose of oversight and monitoring is to ensure that contracted workforce development programs are operating in accordance with all applicable federal, state, local regulations and policies associated with all Workforce Innovation and Opportunity Act (“WIOA”) funded subrecipient agreements. Monitoring will be scheduled twice a year, or at any other time at the discretion of WorkSource Atlanta (“WSA”) to ensure that all services and programs are designed and operating to achieve expected results, to ensure funds are being spent for authorized purposes, to ensure reliable and timely information is captured, reported, and utilized to improve decision-making, and to aid in corrective action/resolution of findings.

II. Background
All subrecipients will be monitored both financially and programmatically for compliance. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”) found at 2 C.F.R. 200 requires that all non-Federal entities in receipt of federal grants – whether directly or via a pass-through – address risk of the award lifecycle: pre-award, award, and post-award. WSA staff will report outcomes of the monitoring reports to the WorkSource Atlanta Local Workforce Development Board (“LWDB”). The LWDB will use the results of monitoring to evaluate the consistency of program results against expected goals. Results from monitoring reviews will also be used to analyze program performance and current and future program funding objectives. In compliance with the Uniform Guidance monitoring of the post-award phase, the sub-recipient is required to identify and remedy any failures.

III. Subrecipient Monitoring Policy
A complete on-site monitoring in the areas of finance, program, and compliance will be conducted once a year, preferably at mid-point of the program year. Additionally, desk and site reviews will be conducted during the year. Written reports will be provided to the LWDB summarizing performance, operation, and monitoring of all WSA WIOA subrecipients programs. The report will identify areas of concern and non-compliance, as well as outstanding practices and performance. The LWDB shall utilize this information in the decision-making process regarding current and future program procurement(s) changing program direction and requires corrective action to resolve concerns.

A. Introduction
Federal guidelines require that all recipients of federal funds authorized under the Workforce Innovation and Opportunity Act be subject to monitoring to ensure that adequate controls are in place.

2 CFR §200.328 Monitoring and reporting program performance.
(a) Monitoring by the non-Federal entity. The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity.
2 CFR §200.331(d) Requirements for pass-through entities.
(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

(1) Reviewing financial and performance reports required by the pass-through entity.
(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.
(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by §200.521 Management decision.

B. Subrecipient vs. Vendor Determination
WorkSource Atlanta will utilize the guidance found at 2 CFR §200.330 to identify if a recipient of federal grant funds is a subrecipient or a contractor.

2 CFR §200.330 Subrecipient and contractor determinations.
The non-Federal entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. Therefore, a pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. The Federal awarding agency may supply and require recipients to comply with additional guidance to support these determinations provided such guidance does not conflict with this section.

(a) Subrecipients. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. See §200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

(1) Determines who is eligible to receive what Federal assistance;
(2) Has its performance measured in relation to whether objectives of a Federal program were met;
(3) Has responsibility for programmatic decision making;
(4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
(5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

(b) Contractors. A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with
the contractor. See §200.22 Contract. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:

1. Provides the goods and services within normal business operations;
2. Provides similar goods or services to many different purchasers;
3. Normally operates in a competitive environment;
4. Provides goods or services that are ancillary to the operation of the Federal program; and
5. Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

(c) Use of judgment in making determination. In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

C. Guiding Principles for Monitoring

1. Risk assessment. Assessing risk prior to engaging in monitoring is helpful to determine the sample size, areas of concern and focus. Past performance, including previous monitoring results, size of the federal award, management turnover, audit findings and other criteria are utilized. A clean audit statement is required within the contract process.
2. Report review and analysis. How will audits and other reports inform your decisions? What could findings—even those not related to WIOA—tell you about how conditions will be onsite?
3. Desk monitoring guides. Onsite visits may be unnecessary or impractical. What documents can be provided electronically or through other means that will enable you to review your subrecipient’s performance?
4. Onsite monitoring guides. Having clear and concise tools to work from while onsite will help keep you and your team focused. If it becomes necessary to revise your tools, be sure to make revisions after the monitoring visit is completed.
5. Report formats and templates. Having clear templates to work from will make it easier to issue decisions and govern the monitoring process post-visit. Be clear and be specific when issuing reports.
6. Become familiar with the Uniform Administrative Guidance, your own policies and procedures, and those of your subrecipient.
7. All incurred expenses must be supported by adequate documentation. (Conference or meeting agendas, invoices, hotel bills, receipts, etc.) See 2 CFR §200.302.
8. The Technical College System of Georgia, Office of Workforce Development, the City of Atlanta’s Mayor, and the WorkSource Atlanta Local Workforce Development Board are the fiscal recipient custodians.
of federal funds, which must be safeguarded and used only for legitimate business purposes.

(9) Use of this policy guide should not replace adequate and careful study of the Uniform Guidance.

(10) Look for opportunities to provide technical assistance before, during, and after visits.

D. Monitoring Tools and Guides

(1) Risk Management

A risk assessment will be conducted prior to the annual financial, programmatic, and compliance monitoring as a way to better inform the monitoring process. Subrecipient monitoring will be identified by risk: low, medium, and high. Appropriate monitoring procedures accompany each risk level. Risk assessments look at the following areas:

(a) Management stability
(b) Efficiency of internal controls
(c) Gap between actual and expected results
(d) Commitment of State and Federal resources
(e) Complexity of information systems

(2) A subrecipient may be considered high risk under the following conditions:

(a) Demonstrated ability to administer the program – in general, the subrecipient should have experience with similar programs and demonstrate sufficient knowledge of the laws and regulations of the program to successfully operate it.
(b) Recent change in contract or scope of services and responsibilities – new responsibilities increase the possibility that the subrecipient might generate a finding.
(c) Turnover of key personnel – staff turnover can negatively impact program effectiveness.
(d) Possibility of non-compliance – previous issues of non-compliance, questioned costs, or fiscal sanctions are indicative of a high-risk program.
(e) Past reporting – reporting should be timely and accurate.
(f) Condition of the independent audit – subrecipients are expected to submit a copy of their most recent single audit.
(g) Past monitoring findings – while monitoring findings are not uncommon, a number of serious and severe findings or an inability to resolve said findings in a timely manner are indicative of a high-risk program.
(h) Resources committed to the program – where WIOA funds represent a significant percentage of the organization’s budget or an organization which lacks non-federal funds equivalent to 25% of the program budget increases the inherent risk to the fiscal stability of the organization.
(i) Internal Monitoring – the ability of the subrecipient to effectively monitor their own internal processes can be key factor establishing risk.

(j) Complaints – complaints, like findings, are a common occurrence, especially in more complex programs. The ability of the subrecipient to effectively and efficiently resolve complaints is a key factor in risk assessment. Adverse resolution may have a monetarily adverse effect on the organization, effecting its ability to continue providing quality programs and services.

(k) Demonstrated ability to meet performance measures – subrecipients should meet 100 % of their goal in the following areas: employment, enrollments, and expenditures.

E. Internal Controls
   All subrecipients will provide a copy of their financial audit, to include a completed Internal Control Questionnaire.

F. Cash Management and Revenue Recognition
   How does the subrecipient handle their cash flow? Are bank statements reconciled and reviewed by management?

G. Prepaid Program Items
   Prepaid program items (bus passes, gift/gas cards, etc.) should be recognized as assets that have a monetary value and should be safeguarded. WSA will gain an understanding regarding how they are distributed. Who has custody of them? Is a proper inventory kept, and are the items used promptly?

H. Salary and Cost Allocation
   The subrecipients should have a cost allocation plan that establishes a methodology to distribute costs fairly across funding streams. Costs that cannot be allocated directly should be placed in an indirect cost pool. Cost allocation statistics should also be maintained to demonstrate how costs were computed month-to-month. Timesheets should also be maintained and prepared after the fact to demonstrate how time is charged to each grant. The amount of time charged to each grant cannot be based on the subrecipient’s budget but must be a record of actual time charged. Salaries and bonuses paid for with WIOA funds must not exceed the USDOL ETA salary and bonus cap ($183,300).

I. Disbursements
   Disbursements of WIOA funds should be necessary, reasonable, directly or indirectly allocable to one or more grants and adequately documented. Disbursements should not exceed the period of availability for the grant, should be allocated correctly and documentation should support the cost. When determining the reasonability of a disbursement, take into account this guidance from the Code of Federal Regulations:
2 CFR §200.404 Reasonable costs.
A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

J. Purchasing
If the subrecipient engages in procurement-level purchasing, they must follow their own policies and procedures, promote open and free competition when going through the bidding process, and must be adequately documented and demonstrate they are in compliance with Federal, State and/or local rules and regulations.

K. Contracting
All contracts paid for in full or in part with WIOA funds must have all required provisions and must be properly managed.

L. Subrecipient Monitoring
If the subrecipient has a subrecipient, monitoring activities must be completed and documented for all subsequent subrecipients.

M. Findings and Observations
A finding is any specific violation of: Law, Regulations, Uniform OMB Uniform Guidance, Award Agreement, Formal Policy, Training and Employment Guidance Letters (TEGL), Workforce Implementation Guidance Letters (WIGL), and Local Workforce Development Board Adopted Policies.

For a finding to exist, there must be criteria. In addressing the violation in your report, always require an action to correct the finding. It is essential to be clear and specific when detailing the finding.

An observation is an area of concern where no compliance violation has occurred but could result in a finding if not addressed. Observations may be corrected through adopting best business practices. No corrective action is specified, but suggestions can be made to make improvements.

N. Monitoring Process
The subrecipient acknowledges that WorkSource Atlanta has the authority to monitor and assess WIOA funded programs. To ensure that policies are being followed and expectations are being met, WSA staff or a designee will periodically monitor services to ensure compliance. It will be the responsibility of the program operator to make any corrections and to conduct an internal review if areas of concern are found. WSA will follow the below in the performance of a monitoring review.

(1) Desk Review – Monitoring staff seek to gain an understanding of the program or subgrantee prior to a site visit. In a desk review, the subrecipient agreement or program goals are reviewed with key program staff and management, as appropriate. Desk reviews include contracts, agreements, and program
metrics, as well as participant and program records, financial data, and policies and procedures of the subrecipient.

(2) Site Review – Monitoring staff will conduct site reviews, as needed and appropriate, in a professional manner and will accommodate the needs and schedules of personnel and participants. If a subrecipient is not cooperating in the review process, monitoring staff will notify the Board or appropriate management staff immediately.

(3) Entrance Conference – All site visits begin with an entrance conference. At such a conference, the monitor will meet with key program staff. The entrance conference will cover the review process, expected timetable, and the expected requirement for information and access to individuals and records. Logistics about appropriate workspace, working hours, and access to office equipment and phones will also be included in the discussion.

(4) Monitoring Reviews – All monitoring reviews may include desk reviews, site reviews, field reviews of all categorical program and fiscal activities. Specifics may include, but are not limited to the following:

(a) Basic contract and grant requirements
(b) Property
(c) Intake and assessment procedures
(d) Participant eligibility
(e) Case management practices
(f) MIS – reporting and records for both participant and fiscal information
(g) Budgets, allowable costs, cost allocation, and cost limitations
(h) Complaints, grievances, investigations, and hearings (if applicable)
(i) Data entry accuracy and timeliness
(j) Personnel records and practices (if applicable)
(k) Fraud and abuse
(l) Classroom-based training programs
(m) Financial systems and administrative records
(n) Worksite compliance
(o) Compliance with local policies and procedures
(p) Subcontractors
(q) EEO, physical, and programmatic accessibility
(r) Internal monitoring
(s) Customer satisfaction
(t) Procedures regarding the handling of Personally Identifiable Information (PII)

(5) Exit Conference – All site visits end with an exit conference. At such a conference, the monitor will meet with key program staff. The monitor will identify issue of non-compliance found as a result of the review and may offer comments and suggestions on program operation. Further technical assistance may also be discussed. Monitors cannot require action by any subrecipient and will not represent themselves as having this authority.
O. Monitoring Reports

Monitors will prepare a written report at the conclusion of each review. The report will, at a minimum, include:

1. Subrecipient reviewed
2. Date(s) of Review
3. Report Date
4. Scope of Review, including sites and activities reviewed
5. Method of review
6. Findings from the review, including any non-compliance with Federal/State laws, regulations, and other authoritative pronouncements
7. Recommendations for corrective action
8. Observations that can assist in program enhancement
9. Recommendations for corrective action on these observations
10. Any other areas of program performance or financial systems that may deserve special attention

Monitors may also make suggestions for improvements in program operation that are not related to compliance issues and should highlight subrecipient.

In general, a draft monitoring report will be sent to the subrecipient, who will then have a chance to respond to any deficiencies and submit a corrective action plan. A final report will then be issued for any remaining deficiencies and will highlight all responses and replies.

Findings will be structured in the following manner:

1. Condition: Describe and document any conditions that constitute a compliance violation that were found during the desk review and onsite monitoring visit. For example: “No physical inventory of equipment and other capital assets was taken during the last three fiscal years.”
2. Criteria: Specify the statutory, regulatory, OMB guidance citation, or formal policy/procedure that was not met. Any gaps identified must be documented, along with recommendations for reconciliation. For example: “The Uniform Guidance at 2 CFR 200.313(d)(2) states that at a minimum a physical inventory must be conducted every two years.”
3. Cause: Determine and document the cause of each condition. If the immediate cause(s) are undeterminable, due to lack of verification/sufficient documentation, omit a description and state that the cause could not be determined. For example: “The lack of written procedures and proper staff assignment of duties have resulted in the lack of compliance.”
4. Corrective Action: It is important to specify what corrective action the subrecipient must take to remedy the problem and the timeframe for completing the recommended changes. For example: “The agency must implement a policy requiring an annual or biannual inventory of all equipment, identify the staff position responsible for conducting the inventory, and submit a copy of the policy and a completed inventory report to this office within 30 days.”
Corrective action responses from the subrecipient will contain the following information:

1. What will they do and when will it be provided? Who will do it?
2. What is the intended outcome?
3. For questioned costs, the subrecipient must provide missing documentation, make repayment, and transfer cost to non-federal sources.

WSA staff will track all corrective actions until completed. Verify on site if appropriate. If action is not completed within required timeframe, determine appropriate action. Authorized actions to respond to noncompliance can include:

1. Temporarily withhold cash payments or place on a reimbursement basis.
2. Disallow all or part of the cost of the activity or action not in compliance.
3. Wholly or partly suspend or terminate grant.
4. Recommend suspension or debarment proceeding be initiated by a federal awarding agency.
5. Withhold further federal awards for the project or program.
6. Take other remedies that may be legally available, including debt collection.

P. Reporting Timeframes

Draft monitoring reports are due 30 calendar days following the date of the exit conference or the agreed upon due date of any subsequent information provided after monitoring review. The subrecipient will have 10 calendar days to provide a response, unless otherwise agreed upon by the monitoring staff.

A final report will be provided to the LWDB and issued to the subrecipient. The report must be made within 40 days following the receipt of additional information, unless otherwise agreed upon by the monitoring staff. No additional documentation can be requested once a final report has been issued to the subrecipient. The program or subrecipient will have 10 days to provide a remedy to the issues identified.

All monitoring reports will be delivered electronically and must be acknowledged by the program or subgrantee as received.

Q. Response to Monitoring

All subrecipients have 10 calendar days to respond to a draft monitoring report. The response to report should include any plans for corrective action on the part of the subrecipient with a timetable for completion and the staff person responsible for carrying out the action.

Assigned WSA staff will review the responses to determine their adequacy and will follow-up with the subrecipient to ensure that corrective action has been completed and the issues resolved. Monitors may conduct follow-up visits to all subrecipients that had compliance issues in their draft monitoring reports. Follow-up visits should be conducted after a sufficient period of time has passed to allow the subrecipient to take appropriate corrective action.
R. Remedies
The LWDB reserves the right to impose certain restrictions on subrecipient for various reasons, including but not limited to:

(1) Failure to comply contract or award provisions
(2) Failure to comply with applicable laws and regulations
(3) Failure to take appropriate corrective action to resolve a monitoring finding within the time frame specified
(4) Failure to respond to all audit resolution issues with the time specified
(5) Failure to meet performance standards or take required corrective action pursuant to a technical assistance plan developed in coordination with the Office of Research, Performance, and Compliance.

Remedies include, but are not limited to:

(1) Withholding of funds or reimbursements
(2) Recapture of payment
(3) Reduction in budget or award amounts
(4) Termination of the contract or award
(5) Other changes, as deemed appropriate by the Board.

S. Technical Assistance
Staff is available to provide technical assistance to subrecipients in interpreting and applying various parts of local, State, and Federal legislations, regulations, and procedures to ensure compliance. Technical assistance may be provided in the form of on-site staff trainings, phone contact, consultation(s), and through written documentation, as needed.

References
- Workforce Innovation and Opportunity Act of 2014 (WIOA)
- Public Law 113-128, Section 185(a)
- WIG GA-19-009
Agenda Section VII.

Action Item

FY20 Operating Budget
## WSA FY 20 Operating Budget

<table>
<thead>
<tr>
<th></th>
<th>Carryover Funding 2018-2019 (FY18)</th>
<th>2019-2020 Award</th>
<th>Total WIOA 2019-2020 Budget</th>
<th>One Stop Center</th>
<th>Total Agency Budget</th>
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<tbody>
<tr>
<td><strong>REVENUE</strong></td>
<td></td>
<td></td>
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<tr>
<td>WIOA Adult</td>
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<td>$2,921,142</td>
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<td>$2,921,142</td>
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<td>1,811,782</td>
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<td>WIOA Youth</td>
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<td>-</td>
<td>-</td>
<td>$65,148</td>
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<tr>
<td>Impact Homelessness</td>
<td>397,180</td>
<td></td>
<td>397,180</td>
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<tr>
<td><strong>TOTAL REVENUE</strong></td>
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<td>$4,079,142</td>
<td>$7,082,476</td>
<td>$65,148</td>
<td>$7,147,624</td>
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<td><strong>EXPENSES</strong></td>
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<td></td>
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<td>Salaries and Fringe Benefits</td>
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<td>1,285,705</td>
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<td>Direct WIOA Participant Expense</td>
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<tr>
<td>Service Providers</td>
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<td><strong>REVENUE OVER(UNDER) EXPENSES</strong></td>
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<td>2,237,965</td>
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<td><strong>Notes:</strong></td>
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</tr>
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<td></td>
<td>$2.2M represents amount available for programming activities</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td>80% programmatic requirement</td>
<td>2,936,982</td>
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</table>
# WSA FY20 Budget vs. Actuals

**Budget to Actuals**

7/1 thru 9/30/2019

<table>
<thead>
<tr>
<th>Funding Category</th>
<th>FY20 Budget</th>
<th>Actuals</th>
<th>Variance</th>
</tr>
</thead>
<tbody>
<tr>
<td>WIOA Adult</td>
<td>$2,921,142</td>
<td>$637,477.80</td>
<td>$2,283,664</td>
</tr>
<tr>
<td>WIOA Dislocated Worker</td>
<td>$1,811,782</td>
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<td>$1,772,733</td>
</tr>
<tr>
<td>WIOA Youth</td>
<td>$1,952,372</td>
<td>236,651</td>
<td>$1,715,721</td>
</tr>
<tr>
<td>Impact Homelessness</td>
<td>$397,180</td>
<td>54,192</td>
<td>$342,988</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>$7,082,476</strong></td>
<td><strong>$967,370</strong></td>
<td><strong>$6,115,106</strong></td>
</tr>
</tbody>
</table>


Agenda Section VIII.

Report
State PY18 Monitoring Findings
&
Sanction Letter
November 08, 2019

Executive Director Katerina Taylor
818 Pollard Boulevard, SW
Atlanta, GA 30315

Dear Executive Director Katerina Taylor:

In accordance with federal regulation, the Technical College System of Georgia Office of Workforce (OWD) performed on-site Financial Monitoring and Quality Assurance Programmatic Monitoring for WorkSource Atlanta on October 21 – 25, 2019.

As part of our on-site monitoring, we examined the administrative, programmatic, data, and financial management systems for your local workforce development area (LWDA). Findings requiring corrective action are located in Section II of this report.

As a result of the on-site monitoring, opportunities for strengthening internal control and operating efficiency were identified and outlined as well. These observations can be found in Section III.

A Corrective Action Response (CAR) for the findings detailed in Section II of this Monitoring Report is due ten (10) business days from the date of this notice. The CAR should document a plan for resolving required actions as outlined in this Monitoring Report. The CAR should be sent via email to Wioacommpliance@tcsg.edu and to your assigned compliance officer.

Sincerely,

[Signature]

Joe Dan Banker
Assistant Commissioner

CC: LWDA CLEO
    LWDA BOARD CHAIR
Monitoring Report on
Financial and Programmatic Compliance

WorkSource Atlanta
Local Workforce Development Area No. 03

Program Year 2018 Monitoring Report
Onsite Period Review: October 21 – 25, 2019
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      Prior Year Finding # LWDA 03-2017-18-02 .................................................................................................... 9
      Prior Year Finding # LWDA 03-2017-18-03 .................................................................................................... 9
      Prior Year Finding # LWDA 03-2017-18-04 .................................................................................................... 9
      Prior Year Finding # LWDA 03-2017-18-05 .................................................................................................. 10
      Prior Year Finding # LWDA 03-2017-18-06 .................................................................................................. 10
      Prior Year Finding # LWDA 03-2017-18-07 .................................................................................................. 10
      Prior Year Finding # LWDA 03-2017-18-08 .................................................................................................. 10
      Prior Year Finding # LWDA 03-2017-18-09 .................................................................................................. 11
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Finding # LWDA 03-2018-19-06.................................................................18
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Finding # LWDA 03-2018-19-08.................................................................21
Finding # LWDA 03-2018-19-09.................................................................22
Finding # LWDA 03-2018-19-10.................................................................22
Finding # LWDA 03-2018-19-11.................................................................23
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I. Monitoring Results


The monitoring procedures performed included tests of transaction details, file inspections and inquiries (1) to determine the status of recommendations from the prior year’s monitoring visit(s) and (2) to adequately support the current year’s findings and recommendations.

We have summarized below the results of our testing by Category:

<table>
<thead>
<tr>
<th>Category</th>
<th>Prior Year Findings</th>
<th>Current Year Findings</th>
<th>Current Year Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 – Financial Management Systems</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2.0 – Cash Management &amp; Revenue Recognition</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>3.0 – Prepaid Program Items</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>4.0 – Timekeeping, Salary and Cost Allocation Testing</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>5.0 – Disbursement Testing</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>6.0 – Purchasing</td>
<td>0</td>
<td>0</td>
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</tr>
<tr>
<td>7.0 – Contracting</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>8.0 – Subrecipient Monitoring</td>
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<td>1</td>
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</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>4</strong></td>
<td><strong>1</strong></td>
<td><strong>0</strong></td>
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</table>
### PY 2017 and PY 2018 Programmatic Monitoring Results

<table>
<thead>
<tr>
<th>Category</th>
<th>Prior Year Findings</th>
<th>Current Year Findings</th>
<th>Current Year Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 – Programmatic Administration</td>
<td>0</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>2.0 – Participant Eligibility</td>
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<td>0</td>
</tr>
<tr>
<td>3.0 – Veteran’s Priority of Service</td>
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</tr>
<tr>
<td>4.0 – Provision of Services</td>
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<td>0</td>
</tr>
<tr>
<td>5.0 – Employment Services/Training</td>
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<td>0</td>
</tr>
<tr>
<td>6.0 – Support Services</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>7.0 – Credential Attainment</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>8.0 – Exit and Follow-Up Services</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>9.0 – Grievance</td>
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<tr>
<td>10.0 – Subrecipient Programmatic Monitoring</td>
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<tr>
<td><strong>TOTAL</strong></td>
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<td><strong>3</strong></td>
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</table>

### PY 2017 and PY 2018 Compliance Monitoring Results

<table>
<thead>
<tr>
<th>Category</th>
<th>Prior Year Findings</th>
<th>Current Year Findings</th>
<th>Current Year Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 – Corrective Action Response Implementation</td>
<td>3</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td>2.0 – Internal Control Environment</td>
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<tr>
<td>3.0 – EO &amp; Nondiscrimination</td>
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<tr>
<td>4.0 – Chief Local Elected Official Board Review</td>
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<td>5.0 – Local Workforce Development Board Review</td>
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<tr>
<td>6.0 – A-133</td>
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</tr>
<tr>
<td><strong>TOTAL</strong></td>
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<td><strong>12</strong></td>
<td><strong>0</strong></td>
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</table>
A summary of the results of our review of the prior year’s findings is included in the table below. A new finding may be created for an unresolved finding from the prior year’s monitoring.

<table>
<thead>
<tr>
<th>Finding</th>
<th>Resolved</th>
<th>Unresolved</th>
<th>New Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>LWDA 03-2017-18-01 Programmatic Administration</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-01</td>
</tr>
<tr>
<td>LWDA 03-2017-18-02 Participant Eligibility</td>
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<td></td>
<td>None</td>
</tr>
<tr>
<td>LWDA 03-2017-18-03 Contracting</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-02</td>
</tr>
<tr>
<td>LWDA 03-2017-18-04 Internal Control Environment</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-03</td>
</tr>
<tr>
<td>LWDA 03-2017-18-05 Internal Control Environment</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>LWDA 03-2017-18-06 Contracting</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-04</td>
</tr>
<tr>
<td>LWDA 03-2017-18-07 Contracting</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-05</td>
</tr>
<tr>
<td>LWDA 03-2017-18-08 Subrecipient Monitoring</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-06</td>
</tr>
<tr>
<td>LWDA 03-2017-18-10 Grievance</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-08</td>
</tr>
<tr>
<td>LWDA 03-2017-18-11 Participant Eligibility</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-09</td>
</tr>
<tr>
<td>LWDA 03-2017-18-12 Internal Control Environment</td>
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<td>X</td>
<td></td>
</tr>
<tr>
<td>Finding</td>
<td>Resolved</td>
<td>Unresolved</td>
<td>New Finding</td>
</tr>
<tr>
<td>-------------------------</td>
<td>----------</td>
<td>------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>LWDA 03-2017-18-13</td>
<td></td>
<td>X</td>
<td>LWDA 03-2018-19-10</td>
</tr>
<tr>
<td>Participant Eligibility</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The CAR allows the LWDA to present their proposed corrective action. OWD will examine the records and information provided by the Entity in order to determine the appropriateness of their proposed actions. If applicable, OWD will then determine an appropriate redress for questioned costs. Review of the proposed actions and supplementing documentation may result in revisions (additions or deletions) to the required corrective actions. The LWDA is then obliged to comply with the required reimbursement of any costs determined to be disallowed after the CAR review process.

If the Entity has current year findings it must submit a CAR response to OWD within ten (10) business days of receipt of this Monitoring Report.
II. Findings

A. Corrective Action Response Implementation

Prior Year Finding # LWDA 03-2017-18-01

Programmatic Administration – Lack of One-Stop Certification

Finding/Condition: The LWDA did not successfully certify its one-stop.

Status: Unresolved

Prior Year Finding # LWDA 03-2017-18-02

Participant Eligibility – Lack of Required Documentation

Finding/Condition: In 6 out of 14 Youth participant case files tested in PY16, Georgia Work Ready Online Participant Portal records indicated the participant was enrolled in Work Experience, but the case file did not include a Work Experience agreement. The LWDA has not been able to provide appropriate documentation of Work Experience agreements for identified participants to OWD throughout the Corrective Action period (November 8, 2017– March 22, 2019).

Status: Resolved

Prior Year Finding # LWDA 03-2017-18-03

Contracting – Memorandum of Understanding

Finding/Condition: The MOU has not been executed by all partners and co-location has not been implemented.

Status: Unresolved

Prior Year Finding # LWDA 03-2017-18-04

Internal Control Environment – Lack of Policies and Procedures Regarding Change in Personnel

Finding/Condition: The LWDA was unable to complete state monitoring as scheduled due to change in management personnel.

Status: Unresolved
**Prior Year Finding # LWDA 03-2017-18-05**

Internal Control Environment – Lack of Updated Policies and Procedures

**Finding/Condition:** The LWDA has not updated its policies and contract templates with C.F.R. references applicable to the Workforce Innovation and Opportunity Act (WIOA).

**Status:** Resolved

**Prior Year Finding # LWDA 03-2017-18-06**

Contracting – Failure to Identify Subrecipient

**Finding/Condition:** The contract with In the Door, LLC did not properly identify the entity as a subrecipient.

**Status:** Unresolved

**Prior Year Finding # LWDA 03-2017-18-07**

Contracting – Missing Profit Provision

**Finding/Condition:** The LWDA programmatic administrator did not include required details defining how In the Door, LLC, a for-profit subrecipient, may earn the profit identified in their contract.

**Status:** Unresolved

**Prior Year Finding # LWDA 03-2017-18-08**

Subrecipient Monitoring – Lack of Monitoring Procedures

**Finding/Condition:** The LWDA does not perform subrecipient monitoring activities to review the following:

- Compliance with federal, state, agency rules, laws, regulations or program requirements
- Compliance with contract/grant award/agreements terms and conditions
- Completion of all deliverables received per contract terms; and,
- Resolution of any audit findings or required corrective actions

**Status:** Unresolved
Prior Year Finding # LWDA 03-2017-18-09

Timekeeping, Salary and Cost Allocation – Incorrect Allocation of Time

Finding/Condition: In 3 out of 12 timesheets tested, LWDA staff reported time that did not provide reasonable

Status: Unresolved

Prior Year Finding # LWDA 03-2017-18-10

Grievance – Lack of Grievance Form

Finding/Condition: In 8 of 17 Adult participant case files and 3 out of 16 Youth participant case files tested, the file did not contain proper grievance documentation.

Status: Unresolved

Prior Year Finding # LWDA 03-2017-18-11

Participant Eligibility – Lack of Required Documentation

Finding/Condition:

1. In 1 out of 17 Adult participant case files tested, documentation of an ITA was uploaded to the Georgia Work Ready Online Participant Portal. However, no ITA enrollment was in GWROPP. The enrollment was added after on-site testing was completed.

2. In 1 out of 12 Dislocated Worker participant case files tested, the files lacked proper documentation of need for supportive services and no documentation was provided requesting supportive services. Documentation was added after on-site testing was completed.

3. In 4 out of 16 Youth participant case files tested and 3 out of 17 Adult participant files, Georgia Work Ready Online Participant Portal records indicated the participant was enrolled in Work Experience; however, the case file did not include a Work Experience agreement. Documentation for 3 of the missing 4 Youth agreements and 2 of the missing 3 Dislocated Worker agreements were provided to OWD staff after on-site testing was completed.

4. In 4 of 17 Adult participant case files, 1 out of 12 Dislocated Worker participant case files and 4 out of 16 Youth participant files tested, the case
file did not contain documentation of quarterly follow-ups prior to the appropriate deadlines after the participant was exited.

Status: Unresolved

**Prior Year Finding # LWDA 03-2017-18-12**

Internal Control Environment – Failure to Submit Required Monitoring Documents

Finding/Condition: The LWDA failed to provide documentation requested by OWD in a timely manner. Interview questions for programmatic staff were sent the week prior to the on-site monitoring visit and had not been provided to OWD prior to the exit meeting, despite repeated attempts to collect the information. The required interview questions were completed and provided to OWD staff after the conclusion of the on-site monitoring visit.

Status: Resolved

**Prior Year Finding # LWDA 03-2017-18-13**

Participant Eligibility – Improper Documentation

Finding/Condition: In 1 out of 12 Dislocated Worker participant case files tested, the files lacked the proper documentation of Selective Service registration or an allowable exemption. LWDA staff were able to locate and provide monitors with verification of Selective Service registration before the conclusion of on-site monitoring. However, while the individual in question was indeed registered for Selective Service and eligible to receive federal funds, the monitors noted that the form being utilized by LWDA staff is not adequate to provide substantial documentation of an allowable exemption. The form allows a participant to self-attest that they did not register under one of the allowable exemptions, and supporting documentation is not collected. The LWDA received a finding and disallowed cost for the same issue in PY16. While the issue in PY16 was resolved, it is clear the LWDA has not changed their policies and procedures or conducted staff training to ensure appropriate documentation is collected for allowable exemptions.

Status: Unresolved

B. Detail Current Year Findings
Finding # LWDA 03-2018-19-01

Programmatic Administration – Lack of One-Stop Certification

Finding/Condition: The LWDA did not successfully certify its one-stop by June 30, 2017. Furthermore, the LWDA has failed to adopt the certification criteria for subsequent years and implement the corrective actions identified in PY16 and PY17 monitoring reports.

Criteria: 20 C.F.R. § 678.800 states, “How are one-stop centers and one-stop delivery systems certified for effectiveness, physical and programmatic accessibility, and continues improvement?

(d) Local WDBs must assess at least once every 3 years the effectiveness, physical and programmatic accessibility, and continuous improvement of one-stop centers and the one-stop delivery system using the criteria and procedures developed by the State WDB.”

Additionally, TEGL 15-16 states: “LWDAs are required to certify all one-stops by June 30, 2017.”

Cause: The LWDB failed to certify its comprehensive and affiliate one-stop sites in accordance with federal law.

Effect: The LWDA has not ensured the programmatic and physical accessibility or effectiveness of the one-stop system to ensure that WIOA programs are being provided in accordance with the law. Some participants may not be able to access required programs resulting in noncompliance with the federal law.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Complete the one-stop certification process for all comprehensive and affiliate one-stop sites utilizing the Georgia One-Stop Certification Guidelines; and,

- Submit the completed certification to OWD within ten (10) business days of the LWDB meeting in which the certifications are approved.

Finding # LWDA 03-2018-19-02

Contracting – Memorandum of Understanding

Finding/Condition: The MOU has not been executed by CLEO and LWDB chair and, as a result, co-location has not been officially implemented.
Criteria: 20 C.F.R. §678.500(d) states “When fully executed, the MOU must contain the signatures of the Local WDB, one-stop partners, the chief elected official(s), and the time period in which the agreement is effective. The MOU must be updated not less than every 3 years to reflect any changes in the signatory official of the Board, one-stop partners, and chief elected officials, or one-stop infrastructure funding.”

Cause: The LWDA lacks internal controls to ensure that it has an executed One-Stop MOU.

Effect: The LWDA failed to adhere to federal requirements and partners have not been able to officially co-locate at the One-Stop.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Ensure CLEO and LWDB chair execute the MOU, and submit a copy to OWD.

Finding # LWDA 03-2018-19-03

Internal Control Environment – Lack of Policies and Procedures Regarding Change in Personnel

Finding/Condition: The LWDA was unable to complete PY17 state monitoring as scheduled due to change in management personnel.

Criteria: 2 CFR § 200.303 states,

“The non-Federal entity must: (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).”

Cause: The LWDA failed to execute a policy and procedure regarding internal controls with respect to change in personnel.

Effect: When LWDA management personnel changed, the LWDA lost access to documentation pertinent to LWDA operations and state monitoring.
Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Submit the approved policy to OWD within ten (10) business days of the LWDB meeting in which the policy was approved.

Finding # LWDA 03-2018-19-04

Finding/Condition:

- PY17: The contract with In the Door, LLC did not properly identify the entity as a subrecipient.
- PY18: The contract with Atlanta Technical College did not properly identify the entity as a subrecipient.

Criteria: Training and Employment Guidance Letter 15-16, Competitive Selection of One-Stop Operators, Section 6 states, “Entities selected and serving as one-stop operators are subrecipients of a Federal award and thus are required to follow the Uniform Guidance.”

2 C.F.R § 200.331 Requirements for pass-through entities states, “All pass-through entities must:

(a) Ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and subaward. Required information includes:

(1) Federal Award Identification.

   (i) Subrecipient name (which must match registered name in DUNS);

   (ii) Subrecipient’s DUNS number (see §200.32 Data Universal Numbering System (DUNS) number);

   (iii) Federal Award Identification Number (FAIN);

   (iv) Federal Award Date (see §200.39 Federal award date);

   (v) Subaward Period of Performance Start and End Date;

   (vi) Amount of Federal Funds Obligated by this action;
(vii) Total Amount of Federal Funds Obligated to the subrecipient;

(viii) Total Amount of the Federal Award;

(ix) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);

(x) Name of Federal awarding agency, pass-through entity, and contact information for awarding official,

(xi) CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement;

(xii) Identification of whether the award is R&D; and (xiii) Indirect cost rate for the Federal award (including if the de minimis rate is charged per §200.414 Indirect (F&A) costs).

(2) All requirements imposed by the pass-through entity on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award.

(3) Any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports;

(4) An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this part), or a de minimis indirect cost rate as defined in §200.414 Indirect (F&A) costs, paragraph (b) of this part.

(5) A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient’s records and financial statements as necessary for the pass-through entity to meet the requirements of this section, §§200.300 Statutory and national policy requirements through 200.309 Period of performance, and Subpart F—Audit Requirements of this part; and

(6) Appropriate terms and conditions concerning closeout of the subaward."

Cause: The LWDA programmatic administrator lacks internal controls to ensure all subrecipients are appropriately identified and treated as subrecipients.
Effect: The LWDA programmatic administrator failed to adhere to federal contracting requirements. Noncompliance with these requirements could result in potential questioned costs for all contract-related disbursements.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- PY17: Review and amend existing contracts to identify In the Door, LLC as a subrecipient, and submit amended versions to OWD.
- PY18: Review and amend existing contracts to identify Atlanta Technical College as a subrecipient, and submit amended versions to OWD.

Finding # LWDA 03-2018-19-05

Contracting – Missing Profit Provision

Finding/Condition: The LWDA programmatic administrator did not include required details defining how In the Door, LLC, a for-profit subrecipient, may earn the profit identified in their contract.

Criteria: 2 C.F.R. § 200.323 (b) Contract cost and price states, “The non-Federal entity must negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.”

TEGL 15-16 Sec. 6(d) states, “Negotiation with for-profit entities entitled to earn profit must separate amounts intended to pay for costs from amounts intended to pay for profit. Contract price equals costs plus profit. Profit should be based on the contractors’ efforts and risks in achieving a performance result that typically aligns with the performance measures outlined in the Local WDB’s plan. Conditions to consider in quantifying the opportunity to earn profit are referenced at 48 CFR 15.404-4. Local WDBs are allowed to cap the maximum profit potential that could be earned per performance results within the approved budget. The earning of profit should not be based on total budget, expending of the budget, and/or pass through costs, such as tuition or fixed costs, that require minimal to no effort from the contractor nor directly achieve a performance goal.”

Cause: The LWDA failed to define how the Comprehensive One-Stop Operator earns profit.
Effect: The LWDA failed to adhere to federal contracting requirements. Noncompliance with these requirements could result in potential questioned costs and disallowed or unearned profit by the for-profit subrecipient.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Modify the existing contract to identify how the for-profit entity can earn the profit identified in the contract, and submit the amended version to OWD.

Finding # LWDA 03-2018-19-06

Subrecipient Monitoring – Lack of Monitoring Procedures

Finding/Condition: The LWDA does not perform subrecipient monitoring activities to review the following:

- Compliance with federal and state agency rules, laws, regulations or program requirements;
- Compliance with contract/grant award agreements terms and conditions;
- Completion of all deliverables received per contract terms; and,
- Resolution of any audit findings or required corrective actions.

Criteria: 2 C.F.R. §200.331 Requirements for pass-through entities states, “All pass-through entities must: [...] 
(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

(1) Reviewing financial and performance reports required by the pass-through entity.

(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.

(3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by §200.521 Management decision.

(e) Depending upon the pass-through entity’s assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper
accountability and compliance with program requirements and achievement of performance goals:

(1) Providing subrecipients with training and technical assistance on program-related matters; and

(2) Performing on-site reviews of the subrecipient's program operations;

(3) Arranging for agreed-upon-procedures engagements as described in §200.425 Audit services.

(f) Verify that every subrecipient is audited as required by Subpart F—Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501 Audit requirements.

(g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

(h) Consider taking enforcement action against noncompliant subrecipients as described in §200.338 Remedies for noncompliance of this part and in program regulations.”

Cause: The LWDA did not identify a need for subrecipient monitoring. The LWDA demonstrates a lack of understanding for federal requirements regarding responsibilities of pass-through entities.

Effect: The LWDA failed to comply with federal requirements. Noncompliance with federal statutes could lead to a lack of proper monitoring of subrecipients and potential liability.

Required Action(s): OWD requires the LWDA complete tasks that include, but are not limited to, the following:

- Identify all subrecipients and amend contracts, as necessary, to include required contract provisions;
- Obtain confirmation from all current subrecipients that they have an understanding of their status as a subrecipient of WIOA funds;
- Establish a formal subrecipient monitoring policy and process, including a monitoring plan and schedule that will establish compliance to all federal pass-through requirements. The policy must address programmatic monitoring requirements and processes, as well as financial;
- Provide OWD with a copy of the subrecipient monitoring plan and schedule for review within 90 days of receipt of OWD’s final monitoring report;
- Submit LWDB-approved subrecipient monitoring policy within ten (10) business of LWDB meeting in which it was approved; and,
• Conduct staff training to ensure adherence to established or revised policies and procedures.

Finding # LWDA 03-2018-19-07

Timekeeping, Salary and Cost Allocation – Incorrect Allocation of Time

Finding/Condition:

• PY17: In 3 out of 12 timesheets tested, LWDA staff reported time that did not provide reasonable assurance that the charges were accurate reflections of work performed.

• PY18: In 4 out of 10 timesheets tested, LWDA staff reported time that did not provide reasonable assurance that the charges were accurate reflections of work performed.

Criteria: 2 C.F.R. §200.430(h)(8)(i) Standards for Documentation of Personnel Expenses states: “(i) (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

(i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;

(ii) Be incorporated into the official records of the non-Federal entity;

(iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities (for IHE, this per the IHE’s definition of IBS);

(iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;’’

Cause: The LWDA demonstrates a lack of understanding of federal requirements for timekeeping.

Effect: The LWDA failed to comply with federal timekeeping requirements. Federal funding streams may be overcharged or undercharged relative to the actual number of hours worked by employees for federal grant activities.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:
Conduct staff training to ensure adherence to existing policies and procedures. The LWDA must formally instruct all staff members to record true and accurate hours worked per federal funding streams on future Personnel Activity Reports; and,

Submit verification of staff training to OWD (i.e., memo or email circulated, training sign-in sheet, etc.).

Finding # LWDA 03-2018-19-08

Grievance – Lack of Grievance Form

Finding/Condition:

- PY17: In 8 of 17 Adult participant case files and 3 out of 16 Youth participant case files tested, the file did not contain proper grievance documentation.
- PY18: In 4 of 18 Adult, 16 of 21 Dislocated Worker, and 5 of 6 Youth case files tested, the file did not contain the proper grievance documentation.

Criteria: 29 C.F.R. §38.36(a)(4) states, “At a minimum, the Equal Opportunity Notice required by §38.34 and §38.35 must be: (4) Provided to each participant and employee; the notice must be made part of each employee’s and participant’s file. It must be a part of both paper and electronic files, if both are maintained.”

Cause: The LWDA lacks internal controls to ensure that correct and updated grievance forms include the participant’s signature and date.

Effect: The LWDA failed to comply with federal regulatory requirements. Noncompliance with federal regulations implementing the nondiscrimination and equal opportunity provisions of WIOA could lead to civil rights violations.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- PY17: Submit the newly established policies to OWD within ten (10) business days of the LWDB meeting in which the policies are approved.
- PY18:
  - Review all active participant case files to verify participant’s receipt of an updated grievance form;
If the participant did not receive an updated grievance form, notify the participant of the change in procedure and document the notification in WorkSource Georgia Portal; and

- Participate in OWD-led staff training to ensure policies and procedures are followed.

Finding # LWDA 03-2018-19-09

Participant Eligibility – Lack of Required Documentation

Finding/Condition: In 1 out of 16 Youth participant case files tested in PY17, WorkSource Georgia Portal records indicated that the participant was enrolled in Work Experience, but the case file did not include a Work Experience Agreement. The LWDA has not been able to provide appropriate documentation of Work Experience agreement(s) for identified participants (State ID: 585262) to OWD throughout the Corrective Action period (April 2019 – October 2019).

Criteria: Documentation requirements for Work Experience are identified in Section 3.4.1.5 of the State Policies and Procedures Guide.

Cause: The LWDA lacks internal controls for maintaining documentation to support a participant’s enrollment in services.

Effect: Lack of formal, executed training agreements could lead to lost training opportunities and noncompliance with federal regulations. Due to the LWDA’s failure to provide the required documentation, this cost has been disallowed and requires repayment.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Provide OWD with documentation of payments made in support of WIOA activities for the participant identified, to include funding stream;

- Submit the approved Secondary Review policy to OWD within ten (10) business days of LWDB approval; and,

- Participate in OWD-led staff training to ensure compliance with the newly establish policies.

Finding # LWDA 03-2018-19-10

Participant Eligibility – Improper Documentation
Finding/Condition: In 1 out of 12 Dislocated Worker participant case files tested in PY17 monitoring, the files lacked the proper documentation of Selective Service registration or an allowable exemption. LWDA staff were able to locate and provide monitors with verification of Selective Service registration before the conclusion of on-site monitoring. However, the monitors noted that the form being utilized by LWDA staff is not adequate to provide substantial documentation of an allowable exemption. The form allows a participant to self-attest that they did not register under one of the allowable exemptions, and supporting documentation is not collected. The LWDA received a finding and disallowed cost for the same issue in PY16. While the issue in PY16 was resolved, it is clear the LWDA has not changed their policies and procedures or conducted staff training to ensure appropriate documentation is collected for allowable exemptions.

Criteria: Selective Service requirements are identified in Section 3.2.4 of the TCSG OWD Policies & Procedures Guide, in accordance with TEGL 11-11.

Cause: The LWDA lacks adequate policies and internal controls for collecting and maintaining documentation related to Selective Service registration.

Effect: Lack of appropriate eligibility documentation may lead to noncompliance with federal regulations and disallowed costs.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- As required by the PY17 monitoring report, the LWDA has developed policies and procedures. OWD reviewed the policy and provided comments/edits. The LWDA must submit the approved policy to OWD within ten (10) business days of the LWDB meeting in which the policy was approved.

Finding # LWDA 03-2018-19-11

Subrecipient Monitoring – Failure to Monitor Subrecipient

Finding/Condition: The LWDA did not perform subrecipient monitoring of In the Door LLC to review the following:

- Compliance with federal and state agency rules, laws, regulations or program requirements;
- Compliance with contract/grant award agreements terms and conditions;
- Completion of all deliverables received per contract terms; and,
- Resolution of any audit findings or required corrective actions
Criteria: 2 C.F.R. §200.331 Requirements for pass-through entities states, “All pass-through entities must: […]

d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

   (1) Reviewing financial and performance reports required by the pass-through entity.

   (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.

   (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by §200.521 Management decision.

   (e) Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:

       (1) Providing subrecipients with training and technical assistance on program-related matters; and

       (2) Performing on-site reviews of the subrecipient's program operations;

       (3) Arranging for agreed-upon-procedures engagements as described in §200.425 Audit services.

   (f) Verify that every subrecipient is audited as required by Subpart F—Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501 Audit requirements.

   (g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

   (h) Consider taking enforcement action against noncompliant subrecipients as described in §200.338 Remedies for noncompliance of this part and in program regulations.”

Cause: The LWDA lacked adequate documentation that a subrecipient monitoring took place.

Effect: The LWDA failed to comply with federal requirements. Noncompliance with federal statutes could lead to potential liability.
Required Action(s): OWD requires the LWDA complete tasks that include, but are not limited to, the following:

- Complete a monitoring session of the subrecipient before the next Program Year and submit a completed Monitoring Report to OWD.

Finding # LWDA 03-2018-19-12

Programmatic Administration – Missing Documentation in Case Files

Finding/Condition: In 5 of 21 Dislocated Worker and 1 of 6 youth case files tested, the file did not contain documentation of follow-up services after exit by the quarterly deadline.

<table>
<thead>
<tr>
<th>Customer Group</th>
<th>UID Number</th>
<th>Description of Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Youth</td>
<td>290624</td>
<td>Did not contain documentation of Follow Up.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>511372</td>
<td>Did not contain documentation of Follow Up.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>565260</td>
<td>Follow Up was not completed by the quarterly deadline.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>549797</td>
<td>Follow Up was not completed by the quarterly deadline.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>544990</td>
<td>Follow Up was not completed by the quarterly deadline.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>574508</td>
<td>Follow Up was not completed by the quarterly deadline.</td>
</tr>
</tbody>
</table>

In 6 of 20 Dislocated Worker case files tested, the case file did not document a determination of need for training services as identified in an IEP, comprehensive assessment, or Individual Counseling and Career Plan.

<table>
<thead>
<tr>
<th>Customer Group</th>
<th>UID Number</th>
<th>Description of Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dislocated Worker</td>
<td>574508</td>
<td>Did not contain an IEP.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>506247</td>
<td>Did not contain an IEP.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>565260</td>
<td>Did not contain an IEP.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>511372</td>
<td>Did not contain an IEP.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>381207</td>
<td>Did not contain an updated IEP.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>585641</td>
<td>Did not contain an updated IEP.</td>
</tr>
</tbody>
</table>
In 2 of 18 Adult, 2 of 21 Dislocated Worker, and 4 of 6 Youth case files tested, WorkSource Georgia Portal indicated the participants were receiving supportive services; however, the case files failed to include a supportive services request form and/or all supporting documentation.

<table>
<thead>
<tr>
<th>Customer Group</th>
<th>UID Number</th>
<th>Description of Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dislocated Worker</td>
<td>381207</td>
<td>Did not contain supporting documentation for supportive services.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>574508</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
<tr>
<td>Adult</td>
<td>367679</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
<tr>
<td>Adult</td>
<td>578110</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
<tr>
<td>Youth</td>
<td>507112</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
<tr>
<td>Youth</td>
<td>510277</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
<tr>
<td>Youth</td>
<td>500644</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
<tr>
<td>Youth</td>
<td>560004</td>
<td>Did not contain supportive service request form and supporting documentation</td>
</tr>
</tbody>
</table>

In 5 out of 21 Dislocated Worker and 6 of 6 youth case files tested, the file did not contain proper documentation for the participants' work experiences.

<table>
<thead>
<tr>
<th>Customer Group</th>
<th>UID Number</th>
<th>Description of Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dislocated Worker</td>
<td>381207</td>
<td>Did not contain documentation on the appropriateness of the training.</td>
</tr>
<tr>
<td>Youth</td>
<td>290624</td>
<td>Did not contain documentation of an educational component.</td>
</tr>
<tr>
<td>Youth</td>
<td>507112</td>
<td>Did not include a completed worksite agreement.</td>
</tr>
<tr>
<td>Youth</td>
<td>564459</td>
<td>Did not include a completed worksite agreement.</td>
</tr>
<tr>
<td>Youth</td>
<td>500644</td>
<td>Did not include a completed worksite agreement.</td>
</tr>
<tr>
<td>Youth</td>
<td>290624</td>
<td>Did not include a completed worksite agreement.</td>
</tr>
<tr>
<td>Youth</td>
<td>290624</td>
<td>Did not include timesheets and check stubs to verify the dates worked and wages paid for the work experience.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>381207</td>
<td>Did not include timesheets and check stubs to verify the dates worked and wages paid for the work experience.</td>
</tr>
<tr>
<td>Youth</td>
<td>290624</td>
<td>Did not include a training completion form.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>539246</td>
<td>Did not include a training completion form.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>381207</td>
<td>Did not include a training completion form.</td>
</tr>
</tbody>
</table>
Dislocated Worker | 586734 | Did not include a training completion form.

In 1 of 18 Adult, 1 of 21 Dislocated Worker, and 1 of 6 Youth case files tested, the file did not contain a household form to support the participants low-income determination.

<table>
<thead>
<tr>
<th>Customer Group</th>
<th>UID Number</th>
<th>Description of Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult</td>
<td>380915</td>
<td>Did not contain household form to verify low-income status.</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>574508</td>
<td>Did not contain household form to verify low-income status.</td>
</tr>
<tr>
<td>Youth</td>
<td>290624</td>
<td>Did not contain household form to verify low-income status.</td>
</tr>
</tbody>
</table>

Criteria: LWDA’s are required to include certain documentation in participants’ case files. The specific requirements are set forth in the following sections of the TCSG Office of Workforce Development Policies & Procedures Guide:

1. Documentation requirements for Follow-Up Services and Activities are identified in Section 3.4.6 of the OWD Policies & Procedures Guide, in accordance with 20 C.F.R. § 680.150(c).


3. Documentation requirements for supportive services are identified in Section 3.4.4 (III)(E) of the OWD Policies & Procedures Guide, in accordance with C.F.R. § 680.900.

4. Documentation requirements for Work Experience agreements are identified in OWD Policies and Procedures Section 3.4.1.5.

5. Documentation requirements for low-income eligibility for adult and dislocated workers are identified in OWD Policies and Procedures Guide Section 3.2.5 (III) in accordance with 20 CFR § 680.600(b) and requirements for low-income eligibility for youth are identified in OWD Policies and Procedures Guide Section 3.2.6 (III) in accordance with CFR § 681.270.

Cause: The LWDA failed to ensure that required documentation was maintained in WorkSource Georgia Portal.

Effect: Lack of required documentation in WorkSource Georgia Portal could lead to noncompliance with Federal regulations and disallowed costs.
Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Participate in OWD-led staff training to ensure compliance with all documentation requirements; and,

- Provide the missing documentation for the identified participants to OWD for further review.

As a result of the review of requested documentation, additional corrective action may be required.

**Finding # LWDA 03-2018-19-13**

Programmatic Administration – Incorrect Policy

**Finding/Condition:** The LWDA’s Eligible Training Provider Policy fails to inform training providers that it may submit a second-level appeal to the State Workforce Development Board (SWDB) if the provider is dissatisfied with the written resolution received regarding its appeal filed with the Local Workforce Development Board.

**Criteria:** LWDA’s are required to have a policy detailing how it maintains its local Eligible Training Provider List (ETPL) and how it and the State handles appeals from providers. The policy for second-level appeals is established in Section 4.4.7 (VI) of the TCSG Office of Workforce Development Policies & Procedures Guide.

**Cause:** The LWDA failed to update its local policy to ensure compliance with the State’s policy.

**Effect:** LWDA staff do not have access to correct written policy to ensure accurate administration of WIOA programs.

**Required Action(s):** OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Correct the ETP policy to ensure adherence to the State’s policy and submit a draft of the policy to OWD for review;

- Upon OWD approval, submit LWDB-approved policy within ten (10) business of LWDB meeting in which it was approved; and,

- Conduct staff training to ensure compliance with the updated policy.
Finding # LWDA 03-2018-19-14

Programmatic Administration - Medical or Disability-Related Information Not Maintained in Separate File

Finding/Condition: In 1 of 6 Youth case files tested, confidential medical and/or disability-related information was not kept separate from the rest of the file.

Criteria: Requirements regarding medical disability status collection are identified in 29 CFR §38.41(b)(3):

“All medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they must be locked or otherwise secured (for example, through password protection).”

Cause: The LWDA lacks adequate policies and internal controls for collecting, maintaining and securing documentation related to medical and disability-related information.

Effect: Lack of process for the collection and security of confidential information may lead to noncompliance with federal regulation.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Establish policies and procedures to ensure medical and/or disability-related information obtained about a participant, including information that could lead to the disclosure of a disability, be collected on separate forms, and treated as confidential and maintained in in a secured file separate from all other participant information;
- Perform an internal review of case files to ensure that the LWDA has maintained applicable participants’ documentation regarding medical and disability-related information, and that the information has been stored and separated in accordance with local policy and federal regulations; and,
- Conduct staff training to ensure compliance with newly established policy and submit verification of staff training to OWD (i.e., memo or email circulated, training sign-in sheet, etc.).
Local Workforce Development Board Review—Violation of Bylaws

Finding/Condition: The LWDB only met 3 times in PY18 (September 21, 2018; December 13, 2018; and March 14, 2019).

Criteria: Georgia Rule 692-1-.05 Local Workforce Development Board requires that “the number of annual meetings [shall], at a minimum, be no less than four (4).”

Bylaws of the Atlanta Workforce Development Board Article VIII, Section 7.2 states: “Regular meetings of the Board shall be held on a quarterly basis and notice of such meetings will be given at least twenty-four (24) hours in advance of the scheduled meeting, unless unusual circumstances warrant shorter notice.”

Cause: The LWDB failed to meet quarterly in PY18 as specified in its bylaws.

Effect: The LWDB violated state regulations and its own bylaws regarding the frequency of LWDB meetings in PY18.

Required Action(s): OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Ensure LWDB meets as required in its bylaws by holding meetings for the remaining quarters of PY19. OWD requires that the LWDB hold meetings whether or not they anticipate a quorum will be present at the meeting; and,
- Submit documentation of scheduled LWDB meetings for PY19 to OWD.

Local Workforce Development Board Review – Non-compliance with Attendance Requirements

Finding/Condition: A LWDB member missed three (3) consecutive meetings without documented cause, but remains on the LWDB in violation of attendance requirements.

Criteria: GA Rule 692-1-.05(5) states, “A Local Workforce Development Board member shall be automatically removed and replaced for failing to attend three consecutive board meetings without cause.

Bylaws of the Atlanta Workforce Development Board Section 6.4 (I)(4) states, “Tenure on Board. Board members shall remain on the Board until... They are removed from the Board for cause after a hearing before the Board and a majority vote in favor of removal and are notified in writing of their removal. Among other things, conviction of a felony, misconduct, incompetence,
inattention to or inability to perform duties, or absence from three (3) consecutive regular meetings or four (4) regular or special meeting absences in any one-year period except on account of illness or by permission of the Board Chair, shall constitute cause for removal.

**Cause:** The LWDA failed to dismiss one LWDB member as required by State rule and the LWDB’s bylaws for missing three (3) consecutive LWDB meetings.

**Effect:** The LWDB failed to adhere to applicable State rules and LWDB bylaws regarding board member attendance requirements.

**Required Action(s):** OWD requires that the LWDA complete tasks that include, but are not limited to, the following:

- Notify and remind LWDB members of the mandatory removal requirement for failing to attend three (3) consecutive LWDB meetings without cause;
- Ensure that any LWDB member who has missed three (3) consecutive meetings is formally removed from the LWDB and provide OWD with documentation of removal;
- Ensure that the LWDB appoints a replacement LWDB member, who may be the same individual who was removed, in compliance with the LWDB Bylaw’s nomination and placement provisions; and,
- Provide the signed Conflict of Interest form of the new LWDB member to OWD.

**III. Observations**

- None.
October 25, 2019

Office of the Mayor
55 Trinity Ave SW #2500
Atlanta, GA 30303

Mayor Keisha Lance Bottoms,

The Technical College System of Georgia, Office of Workforce Development (OWD) hereby notifies the City of Atlanta that it is imposing sanctions regarding WorkSource Atlanta's provision of Workforce Innovation and Opportunity Act (WIOA) funded activities. OWD, as the state-level administrator of WIOA Title-I programs, is responsible for ensuring the effective and compliant provision of services and use of funds by the State’s Local Workforce Development Areas (LWDAs). As such, and in satisfying oversight requirements, OWD monitors and reviews all WIOA-funded activities provided by LWDAs through annual onsite monitoring, desk reviews, and continual technical assistance.

**Explanation of Sanctionable Act(s):** Per Section 1.5 of the TCSG OWD Policies & Procedures Guide, the following constitute sanctionable acts.

1. Failure to implement corrective actions to resolve findings identified during monitoring
   a. In Program Year 2017, OWD conducted annual on-site monitoring of administrative, programmatic, and financial management systems. As a result of this testing, OWD imposed fifteen (15) findings for issues that constitute a direct violation of federal and/or state criteria. Ten (10) of these findings remain unresolved and have been reissued for PY18 monitoring (See *Attachment A*, findings #1-10). Two (2) of these findings have been in effect for three years without resolution, as they originated in PY16 monitoring.

2. Multiple infractions that, on their own, constitute a Level-One sanction
   a. Although identified in the previously mentioned PY16 and PY17 monitoring, the following findings are sanctionable on their own. The findings are of particular concern as they are the foundation of the One-Stop System and provision of services under WIOA (see *Attachment A*, findings #1 and #2).
      i. The LWDB failed to certify its Comprehensive and Affiliate One-Stop sites, which was initially due June 30, 2017. As a result, the LWDA has not ensured the programmatic and physical accessibility or effectiveness of the one-stop system to ensure WIOA programs are being provided in accordance with the law.
      ii. The LWDA failed to execute a Memorandum of Understanding with all partners and co-location has not been officially implemented. This action was initially due June 30, 2017. As such, the LWDA failed to adhere to federal requirements and partners have not been able to officially co-locate at the One-Stop as mandated.

In addition to the issues identified above, OWD has significant concerns regarding City of Atlanta’s provision of WIOA services. WorkSource Atlanta has failed to seat a compliant, functioning Local
Workforce Development Board until last week. The last compliant LWDB meeting was held March 2019, and prior to that the LWDB only met sporadically in 2018 and 2017. This has directly impacted the LWDB’s ability to implement the required corrective actions multiple years in a row. Activities under WIOA are directed by the LWDB and rely on a seated, compliant board to guarantee the enactment of policies and continued provision of services. WorkSource Atlanta lacks the consistency in leadership and internal controls to ensure the proper administration of WIOA. Also of concern is the City’s lack of urgency in addressing issues that require action by other City departments (i.e., Law, Human Resources, etc.). As the Fiscal Agent, the City of Atlanta is ultimately responsible for the administration of WIOA funds. The failure to resolve these findings has resulted in continued service delivery issues, increases the potential for the misuse of funds, and poses threats to the integrity of the LWDA.

Sanction Status Level:
Level Two Sanction – Imposed for significant failure to perform or comply as required.

Penalty and/or Corrective Action(s) Imposed: In addition to the required actions and deadlines to resolve the PY17 and PY18 findings, OWD requires that the identified parties complete tasks including, but not limited to, the following:

1. Local Workforce Development Board
   a. OWD attendance at future LWDB meetings until OWD deems appropriate;
   b. Mandatory, OWD-led training for WorkSource Atlanta staff and leadership responsible for organizing LWDB meetings; and,
   c. WorkSource Atlanta must shadow another LWDA (to be determined by OWD) to observe best practices in running LWDB meetings

   **DUE: Ongoing; training must be completed prior to December 20, 2019.**

2. Reporting
   a. OWD requires that the LWDA submit a formal, written update regarding the status of all unresolved findings every other week until all issues are satisfactorily resolved. The report should be communicated by LWDA leadership and OWD will utilize this communication to ensure all other technical assistance needs are addressed in a timely manner.

   **DUE: The first report must be submitted to OWD by COB November 8, 2019.**

   b. Until further notice, OWD will conduct unscheduled office visits and interviews of WorkSource Atlanta and subrecipient staff to identify other areas for training and corrective action.

   **DUE: Ongoing**

Additional corrective action(s) may be required at the discretion of OWD. Failure to complete these required actions by the respective deadlines may result in imposition of additional sanctions up to and including suspended or terminated funds and/or LWDA reorganization.
LWDA Response/First Level Review
Any Board or grant recipient dissatisfied with a sanction determination may file a written response with OWD within five (5) business days. The written response must include supporting information and documentation that the sanction was issued in error, whether in whole or in part, or to present mitigating evidence to reduce the sanction.

OWD will review the information presented and respond within ten (10) business days.

Please direct any inquiries regarding the sanction determination to Britney Singer, OWD Compliance Director at BSinger@tcsge.edu.

Sincerely,

Joe Dan Banker
OWD Assistant Commissioner

CC: Kimberlyn Daniel, WorkSource Atlanta

Attachment A: PY18 Monitoring Report
Agenda Section VIII.

Report

Budget Update
FY2020/PY19 Budget Highlights

- **Total Revenue** $7,147,624.00
  Majority is WIOA funds

- **Total Expenditures** $4,909,660.00
  - Salaries $1,325,454.00
  - Service Providers - ResCare and In the Door $2,140,000.00

- **Amount available for programming/operational** $2,237,965.00

- **80% spent/obligated requirement** $2,936,982.00

- **Amount expended - 1st quarter ending 9/30/19** $967,370.00
Agenda Section VIII.

Report

TechHire & WIOA Homeless Grants Update
## TechHire Grant

<table>
<thead>
<tr>
<th>Grant Period</th>
<th>July 1, 2016 – July 30, 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award Amount</td>
<td>$4,000,000.00</td>
</tr>
<tr>
<td>Amount Expended</td>
<td>$327,824.38</td>
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<tr>
<td>Remaining Amount</td>
<td>$3,672,175.62</td>
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<tr>
<td>Participant Target Number</td>
<td>450</td>
</tr>
<tr>
<td>Participants Enrolled</td>
<td>9 (leveraged funds through WIOA)</td>
</tr>
</tbody>
</table>

### Updates

- U. S. Department of Labor, Employment and Training (ETA) conducted a monitoring of the TechHire grant from April 16 – 18, 2019.

- ETA issued their monitoring report with findings to WSA on June 5, 2019.

- WSA submitted a Corrective Action Response (CAR) to the DOL-ETA monitoring report with a revised implementation plan on July 5, 2019.

- As of November 13, DOL-ETA indicated that it could not locate WSA’s CAR; On November 14, WSA resent a copy of the original CAR submission.

- WSA is awaiting official response from DOL-ETA regarding its CAR, and correspondence regarding the status of the grant; DOL-ETA recently indicated that it would send a response by November 25, 2019.
## Impact Project to Affect Homelessness Grant

<table>
<thead>
<tr>
<th>Grant Period</th>
<th>March 1, 2018 – December 31, 2019 (WSA has requested a 90-day extension of the grant)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award Amount</td>
<td>$397,180.00</td>
</tr>
<tr>
<td>Amount Expended</td>
<td>$83,760.44 (as of 11/21/2019)</td>
</tr>
<tr>
<td>Remaining Amount</td>
<td>$313,419.56</td>
</tr>
<tr>
<td>Participant Target Number</td>
<td>55</td>
</tr>
<tr>
<td>Participants Placed on a WEx*</td>
<td>20</td>
</tr>
<tr>
<td>– WEx Location</td>
<td>Gateway Center</td>
</tr>
<tr>
<td>WEx Placements in Process</td>
<td>17</td>
</tr>
<tr>
<td>– WEx Locations</td>
<td>Gateway Center, Veterans Molding Minds, StratiPlan, MD Ross Consulting, The Warrior Alliance</td>
</tr>
<tr>
<td>WEx Placements Remaining</td>
<td>18</td>
</tr>
<tr>
<td>– Pending WEx Locations</td>
<td>Russell Center for Innovation &amp; Entrepreneurship, Atlanta Technical College, Metro Atlanta YMCA, Westside Works, Goodwill</td>
</tr>
<tr>
<td>WEx Positions/Industries</td>
<td>Customer Service/Admin, Landscaping, Case Management, Conference/Event Managements, Maintenance, Culinary, Entry/Analysis, Floor Tech, Custodial Tech</td>
</tr>
<tr>
<td>WEx Length</td>
<td>12 weeks</td>
</tr>
<tr>
<td>WEx Wage</td>
<td>$12/hour</td>
</tr>
</tbody>
</table>

*Work Experience (WEx) is a planned, structured learning experience that takes place in a workplace for a limited period of time. They may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. A WEx may be arranged within the private for-profit sector, the non-profit sector, or the public sector.*
Agenda Section VIII.

Report

ResCare Career Services Update

&

Performance Measures/Targets
Progress Report by
Adult/Dislocated Worker

Total files reviewed = 703
Total manhours = 464
Adult = 287
DW = 24
Non-Compliant = 392
Youth

- Total files reviewed = 230
- Total manhours = 152
- Youth = 101
- Document access needed = 88
- Non-Compliant = 41

44%
18%
38%
Correction Process

- Continued review Soft Exiting files for positive outcomes
- Continued outreach to disengaged participants and provide services if needed
- If no services are needed, or lack of responds within 5 business day. File will be reviewed for hard exit.
To Be Corrected

- Two of the following are needed to support a dislocated worker: Notice of Layoff, Separation notice, UI determination letter, claims determination letter
- Social security cards must be signed to be valid
- Participants must be appropriate for the chosen training program to ensure success for the participant and performance outcomes for the region
Missing eligibility documents such as driver licenses, leases, mortgage statements, SNAP benefits letters

Clear scanned copies of eligibility documents are needed

Wage inquiries are necessary to verify a person is currently not employed

No case management for several months led to 530 participants soft exiting
Non-Compliance Issues

▪ Funding for non-demand occupation programs or programs at schools that are not approved on the ETPL.
▪ Organizations providing homeless attestations that do not address homelessness or returning citizens
▪ Not residing within the city limits of Atlanta
▪ Address not matching the associated verifier.
Non-Compliance Issues

- Using wage inquiries to verify employment
- Individuals qualified as DWs quit/resigned but WSA policy does not have a provision for those that quit/resigned.
- Documents used to verify residency at participation over 30 days old; at times over a year.
- Family size and income not verified.
Non-Compliance Issues

▪ Self attestations were not documented
▪ No proof of “Unlikely to Return” documentation on file as required
▪ Most of the 14 program elements for youth not provided
▪ Youth determined as basic skills deficient with no documented proof uploaded
Non-Compliance Issues

- Co-enrolled individuals as Youth and Adult but with eligibility documents to only support one program.
- Check stubs missing, not enough check stubs to account for the calculated income.
Challenges

- No designated office space for staff
- Insufficient access to telephone (not enough phones for all staff and no access to voicemail)
- No access to equipment for first 4 months
- Very limited access to printer or scanner for first 4 months
Accomplishments

▪ Adult/Dislocated Orientation traffic: 385
▪ Adult/Dislocated Worker New Enrollments: 94
▪ Youth Orientation traffic: 12
▪ Youth Enrollments: 10
▪ Career Services Attendance: 23
Agenda Section VIII.

Report

In the Door, LLC

One-Stop Operator Update
WorkSource Atlanta
Local Workforce Development Board Meeting
Thursday, November 21, 2019

Presented by: Roscell Hall
Program Year Highlights

- Coordinated with business services on hiring events and career fairs.
- Facilitated work readiness workshops at Fort McPherson.
- Presented 'Work Ready Fit' at Atlanta Public School's Parent Summit.
- Hosted the Mandela-Washington Fellows of the Young African Leadership Initiative.
- Installed Virtual Integrated Partner Resource (Direct Linkage) to connect with Virtual Partners.
- Coordinated VITA Free Income Tax Prep February - April.
Program Year Planned Events

Returning Citizens Work Readiness Seminar and Career Fair.

Strengthen partnerships with community organizations such as The Fulton County Library, SWEEAC, VEO, Department of Juvenile Justice.

Veterans Resource Expo and Career Fair.

Continuous improvement to Envoy Digital Sign-In System to ensure accurate data capture.

Department of Labor to have additional support 5 days a week.
## WorkSource Atlanta One-Stop Tracking Report

<table>
<thead>
<tr>
<th>VISITOR BREAKDOWN</th>
<th>JULY</th>
<th>AUGUST</th>
<th>SEPTEMBER</th>
<th>OCTOBER</th>
<th>YEAR TO DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resource Library</td>
<td>233</td>
<td>300</td>
<td>265</td>
<td>340</td>
<td>1,138</td>
</tr>
<tr>
<td>Orientation</td>
<td>118</td>
<td>129</td>
<td>120</td>
<td>118</td>
<td>485</td>
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<tr>
<td>Georgia Department of Labor</td>
<td>45</td>
<td>42</td>
<td>46</td>
<td>50</td>
<td>183</td>
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<tr>
<td>GED</td>
<td>50</td>
<td>34</td>
<td>31</td>
<td>28</td>
<td>143</td>
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<tr>
<td>Hiring Events</td>
<td>0</td>
<td>0</td>
<td>23</td>
<td>26</td>
<td>49</td>
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<tr>
<td>Referrals</td>
<td>0</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Workshops</td>
<td>20</td>
<td>0</td>
<td>5</td>
<td>4</td>
<td>29</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>466</td>
<td>509</td>
<td>490</td>
<td>566</td>
<td>2,031</td>
</tr>
</tbody>
</table>
Agenda Section VIII.

Report

Contracts Update

ResCare

In the Door, LLC
Contract for Adult, Dislocated Worker, and Youth Career Services

− The Board’s Executive Committee approved a resolution on April 14, 2019 to enter into a contract with Arbor E&T, LLC d/b/a ResCare Workforce Services for WIOA Adult/Dislocated Worker and Youth Career Services.

− The Board’s Executive Committee also approved a resolution on April 14, 2019 to re-issue RFPs for WIOA Adult/Dislocated Worker and Youth Career Services.

− The current contract with ResCare Workforce Services is:

   ✓ in an amount not to exceed $2,050,000.00
   ✓ for a term of one (1) year (June 27, 2019 – June 26, 2020) with two (2) one (1) year renewals.
   ✓ a cooperative agreement utilizing WorkSource Fulton’s contract with ResCare.
Contract for One-Stop Operator

- The Board approved a resolution on November 8, 2017 entering into a contract with In the Door, LLC for WIOA One-Stop Operator Services.

- The current contract with ResCare Workforce Services is:

  ✓ In an amount not to exceed $185,000.00
  ✓ For a term of two years (April 11, 2018 – April 10, 2020) with one (1) two (2) year renewal.
Agenda Section VIII.

Report

Invest Atlanta Integration
WorkSource Atlanta and Invest Atlanta Integration Update
**Invest Atlanta & WorkSource Atlanta Integration: Value Proposition and Expected Benefits**

**Value Proposition:** The integration of Invest Atlanta and WorkSource Atlanta aligns economic and workforce development strategy, programming, implementation, reporting and accountability under a single agency. This alignment will create stronger outcomes for employers, residents and efficiencies for both agencies, advancing the city’s overall economic growth and mobility goals.

1. The integrated organization aligns relevant small business and community development programming to create employment pathways for unemployed and underemployed residents.

2. The integration creates career pathways focused on opportunities for unemployed and underemployed residents with a focus on raising wages.

3. The integration creates workforce opportunities for unemployed and underemployed Atlanta residents in development of incentives and programs, undertaken across the agency.

4. The integrated organization will achieve operational efficiencies, consolidate reporting and increase accountability, improving services and outcomes for residents.

5. The integration will align the City’s business attraction and retention efforts with workforce training through a single strategy and a single agency.
# Invest Atlanta & WorkSource Atlanta Integration: Work Plan & Subcommittee Work Groups

## Executive Steering
Committee will assist with providing overall direction and oversee as culture and political climate, and potentially serve as the risk management team. Committee may also vet subcommittee project work as needed.

### Communications
Subcommittee will determine communication/public outreach requirements for the project.

### Finance/Grants Administration
Subcommittee will determine financial requirements with respect to financial systems and grants administration.

### Governance
Subcommittee will determine governance requirements with respect to roles/responsibilities of the Invest Atlanta board, WorkSource Atlanta board, and the City Council.

### Operations
Subcommittee will determine operational requirements with respect to IT systems/processes, physical facilities/asset management, etc.

### Human Resources
Subcommittee will determine HR requirements with respect to the administrative transfer of employees, processes and HR systems.

### Legal
Subcommittee will determine the legal and financial responsibilities of the fiduciary and programmatic entities, Invest Atlanta and WorkSource Atlanta, and produce an Intergovernmental agreement as a final deliverable to be submitted for approval by City Council and the related governing boards.

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Note: All committees will also identify process integration opportunities to improve services and workforce/economic development efforts.
Invest Atlanta & WorkSource Atlanta Integration: High-Level Timeline

**Q4 2019**

- Final development of an Intergovernmental Agreement;
- Complete detailed implementation planning

**Q1 2020**

- Legislative Approval of Intergovernmental Agreement;
- Execution of implementation plan

**LEGEND:**
- **Planning Phase**
- **Implementation Phase**
WorkSource Atlanta will join Invest Atlanta as one of three pillars in their mission to increase economic prosperity for all Atlantans.

The City of Atlanta will remain the fiscal agent for the WIOA grant funds and provide oversight.
Agenda Section IX.

Adjournment