



INTEROFFICE MEMORANDUM

TO: Anthony Nicks, County Auditor
THROUGH:
FROM: Al Nash, Director, Select Fulton *AN*
DATE: October 2, 2019
SUBJECT: Workforce Audit Response

As the grant administrator of Workforce Innovation and Opportunity Act (WIOA) funds for Fulton County, Select Fulton provides job training and employment services to connect Fulton County residents with opportunities for in-demand careers. WIOA services are provided to meet the needs of the individual job seeker and include programs which offer work based learning such as Work Experience.

The recent review of the Veteran's Home and Business Services (VHBS) Work Experience by your team confirms the need for processes and a thoughtful strategy for the use of workforce resources with Fulton employers. Under the leadership of a new Chief Local Elected Official (CLEO) in Chairman Pitts, and a newly constituted Local Workforce Development Board (LWDB), workforce programs can implement the recommended improvements to ensure the highest and best use of workforce funds for the residents and employers of Fulton County.

Attached you will find the response from WorkSource Fulton for each of the findings identified in your report, along with the proposed corrective action that will be put in place under the leadership of the CLEO, the LWDB, and the WorkSource Fulton staff.

CC: Samir Abdullahi, Deputy Director
Brett Lacy, Workforce Division Manager

ATTACHMENTS

Veteran Home Business Services Audit Response

Finding 1- Failure to Perform Background Investigation

Workforce management concurs with the finding that rigorous background checks should be performed on potential partners for workforce development programs. Although work-based learning programs have pre-award review procedures, there lacks sufficient standards and processes to uncover deceptive behavior on the part of vendors, or negative financial history. Furthermore, the level of pre-award review varies based upon the workforce program being considered (i.e. on-the-job training, incumbent worker training, work experience, registered apprenticeship) and is not consistent with the standards to approve a partnership. No policy currently exists to help determine the appropriate workforce program to meet the needs of a potential partner.

WorkSource Fulton will develop a standardized process for evaluating interested employer partners for workforce programs. The process will examine all opportunities which are referred to workforce and will examine at a minimum, the financial standing of the partner, the minimum federal requirements for a work-based learning pre-award review as defined by federal and state law, and alignment with strategic county priorities as defined by Fulton County Government. Strategic criteria may include, but is not limited to, growth industries, priority population, and Fulton community.

Finding 2- Lack of Program Monitoring

Workforce management concurs with the finding that staff did not provide sufficient oversight of training provided to ensure compliance with the non-financial agreement.

WorkSource Fulton has established procedures and processes to evaluate federal compliance and performance for subrecipients providing WIOA career services. Leveraging these concepts and skills, WorkSource Fulton will provide training to staff to review the requirements for monitoring partners providing work-based learning training services for compliance with contract agreements. Additionally, WorkSource Fulton will request Technical Assistance from State administrators for best practices in monitoring work-based learning agreements.

Finding 3 – Failure to Establish Criteria

Workforce management concurs with the finding that no criteria exists to approve partnerships for workforce programs.

WorkSource Fulton will develop a standardized process for reviewing interested employer partners for workforce programs. The process will examine all opportunities which are referred to workforce and will examine at a minimum, the financial standing of the partner, the minimum federal requirements for a

work-based learning pre-award review as defined by federal and state law, and alignment with strategic county priorities as defined by Select Fulton. Strategic criteria may include, but is not limited to, growth industries, priority population, and Fulton community.

Finding 4 – Non-compliance with Written Agreement

Workforce management concurs with the finding that the partner violated the terms of the agreement by extended full-time employment to trainees.

WorkSource Fulton has established procedures and processes to evaluate federal compliance and performance for subrecipients providing WIOA career services. Leveraging these concepts and skills, WorkSource Fulton will provide training to staff to review the requirements for monitoring partners for compliance with contract agreements. Additionally, WorkSource Fulton will request Technical Assistance from State administrators for best practices in monitoring work-based learning agreements.