## **COUNTY OF KANE**

## OFFICE OF COMMUNITY REINVESTMENT Workforce Development Division

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December 13, 2019

John Barr Illinois Department of Commerce and Economic Opportunity Office of Employment and Training 100 W. Randolph Street, Suite 3-400 Chicago, IL 60601

Re: Grant Nos.: 16-632005, 16-651005, 16-661005, 16-681005, 17-632005, 17-661005

17-681005, 18-651005, 18-681005 and 19-681005

Dear Mr. Barr,

This letter serves as the formal response for LWIA 5 to the findings identified in your November 13, 2019 summary letter outling the results of the fiscal and programmatic monitoring of the period of September 24, 2019 through October 10, 2019 by DCEO staff – Tony Lesniak, George Nelson, Michael Whitted, Simona Velazquez, Sheila Sloan and Lori Graham. Our responses to the findings are addressed below after the labeled component and element as they appeared in your letter.

## **Fiscal Monitoring Results:**

**Element:** Minimuim Training Expenditures

**Finding #1:** The grantee did not meet the State of Illinois' Training Expenditure Requirement during Program Year 2018 (July 1, 2018 to June 30, 2019). Chapter 8 of the State of Illinois' Workforce Innovation Opportunity Act e-Policy requires that the minimum expenditure level for the combined calculation of Adult and Dislocated Worker funding streams is fifty percent. The expenditure rate for Local Workforce Innovation Area 5 that was reported to DCEO for the period ending June 30, 2019 was 44.65%.

Corrective Action #1: The grantee in conjunction with the local workforce innovation board must respond to this finding with a written explanation of the conditions that led to the lower training expenditures as well as a corrective action plan for WIOA Program Year 2019. Please note that the local Workforce Innovation Board may be placed on high-risk status for failure to meet the minimum expenditure level, even if granted performance incentive bonus eligibility in a given program year.

LWIA 5 Response: The LWIA achieved a lower than fifty percent training expenditure due largely in part to personnel changes within the County's Finance Department that resulted in significant delays with the recording of grant expenses, which ultimately impacted our ability to authorize adequate ITAs as exact funding availability was unknown. Additionally, sizable

funding reserves were established to support community college participants. Those amounts, in retrospect, were inflated beyond the actual need. This led to lower expenditures for the Spring and Summer semesters.

For Program Year 2020, the County's Finance Department has retained Maria Gonzales as the Manager overseeing WIOA and TAA financial transactions. Ms. Gonzales has resumed her unit's practice of providing monthly reports to programmatic staff as previously established. She also provides detailed training reports that record expenditure, accrual and obligation details for programmatic staff. Secondly, a new tool has been implemented to strengthen the accuracy of the projections we make when reserving training resources for individual clients attending community colleges. This protocol was launched at the beginning of the Fall semester of 2019. Lastly, programmatic staff have enhanced and streamlined the participant intake and enrollment process, which we expect will provide an expedited route to accessing training services and corresponding prompt program starts. This improved process will be implemented in early January 2020.

## **Programmatic Monitoring Results:**

**Element:** Training Services – Trade

**Finding #2:** The dates on the TAA Additional Inforamtion Screen in IWDS, do not match the dates on DCEO Form #002 Trade Adjustment Assistance Standard Application for the following customers:

Brian Carpenter XXX-XX-8266 – The impact date in IWDS (10/23/18) does not match the impact date on the petition (12/17/18). The petition expiration date in IWDS (12/17/20) does not match the expiration date on the petition (10/23/20).

Kanicha Wagner XXX-XX-2635 – The petition expiration date in IWDS (10/26/19) does not match the expiration date of the petition (3/28/21).

Corrective Action #2: For each identified customer, the Grantee must ensure that the dates on the TAA Additional Info Screen match the dates on DCEO Form #002 Trade Adjustment Assistance Standard Application. Case managers must verify the dates being entered with the dates auto-populated from DETS to ensure match. If they do not match, the case manager must review the petition and DETS entries to ensure the correct dates are being entered.

**LWIA 5 Response:** Attached is IWDS documentation for Brian Carpenter and Kanicha Wagner which shows date alignment between IWDS and the petition information as highlighted in yellow.

Thank you, in advance, for your consideration of our responses. Please do not hesitate to contact us if you have any questions or require additional information.

Sincerely,

Scott Berge Director