

December 18, 2020

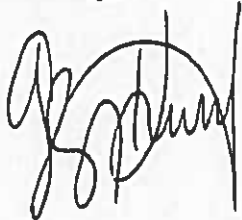
Susan R. Snelick, Executive Director
Workforce Solutions of North Central PA
425 Old Kersey Road
Kersey, PA 15846

Dear Ms. Snelick:

The Bureau of Workforce Development Administration (BWDA) completed Program Year 2019 monitoring of the local workforce development area's fiscal and procurement systems and the local workforce development board's (LWDB) compliance and oversight functions. Monitoring was conducted in accordance with the Workforce Innovation and Opportunity Act (WIOA) and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule, 2 Code of Federal Regulations (CFR) Chapter I, Chapter II, Part 200, et al.

The LWDB is working to resolve the finding(s) identified in the attached report. Therefore, there is no need for a response. Please convey the BWDA's appreciation to all staff members involved for the assistance they provided. If you have any questions, please don't hesitate to contact me by phone at 717.787.6352 or by email at ghart@pa.gov.

Sincerely,



Gregory P. Hart, Jr.
Oversight Services Supervisor

Attachment: PY 2019 Monitoring Report

cc: Ms. Corine Christoff, Chair, North Central Workforce Development Board

**Bureau of Workforce Development Administration
North Central Local Workforce Development Board Compliance and Oversight
and
North Central Local Workforce Development Area Fiscal and Procurement Systems
Analysis and Review for Program Year (PY) 2019
Review conducted by Oversight Services staff member: Melanie Erb**

Dates of Desk Review/Onsite Analysis:

Date(s): December 2019-September 2020

SUMMARY

The Bureau of Workforce Development Administration (BWDA) conducted Program Year (PY) 2019 monitoring of the local workforce development area's (LWDA) fiscal and procurement systems and the local workforce development board's (LWDB) compliance and oversight functions.

A summary of identified findings are as follows:

REVIEW

1. PROCUREMENT AND SUBCONTRACTS

Finding #1: Statement of Financial Interests Not Attached to Contract

Observation: The statement of financial interests, capability-certified statements or single A-133 audit reports for the were not attached to the One-Stop Operator which was reviewed.

Citation: 2 Code of Federal Regulations (CFR) §200.501

Required Action: The LWDB shall include all required documents and forms in the subcontract for all future contracts that are awarded as the result of an RFP. A response is not required.

2. LWDB POLICIES AND AGREEMENTS

No findings or concerns were identified in this section.

3. SERVICE DELIVERY

No findings or concerns were identified in this section.

4. SUNSHINE ACT

Finding #2: Executive Committee meetings are not published for the calendar year.

Observation: The LWDB Executive Committee appears to be meet on a regular basis as determined from the public notices of each meeting. At present, the LWDB provides public notice of each Executive Committee meeting separately.

Citation: *Pennsylvania Sunshine Act*, 65 Pa.C.S. §701 et seq.

Required Action: The LWDB must issue public notice of the Executive Committee meetings at least three days prior to the first meeting, along with the calendar and location of the meetings for the remainder of the year in accordance with the Sunshine Act. **A response is not required.**

Concern #1: Record of abstentions is not made in minutes.

Observation: The LWDB has not made a record of inquiring of abstentions or the lack thereof in the minutes of either the quarterly meetings or the executive committee meetings. Technical assistance was provided via email to LWDB staff during a LWDB quarterly meeting on July 7, 2020, where the LWDB staff indicated that the Board relies on the individual members to voice an abstention. It was recommended that the question be asked at each vote at all future LWDB and Executive Committee meetings and record made in the meetings even if there were no abstentions. **A response is not required.**

5. LWDB ADMINISTRATIVE FUNCTIONS

Finding #3: Incomplete/Missing Youth Monitoring Tool Elements

Observation: The LWDA In-School Youth (ISY) monitoring tool does not specifically review if all minors obtained a work permit or that for minors under age 16, an additional form of Parental Acknowledgment of Minor's Duties and Hours of Employment Parental is filed with the work permit. Of note, the Out-of-School (OSY) Youth monitoring tool does include a section that verifies work permits.

Citation: PA 2012 Act 151, *Child Labor Act*, Section 9

Required Action: The LWDB staff shall review the ISY monitoring tool to revise and include a section for verification that all minors obtained a work permit and that for minors under age 16, an additional form of Parental Acknowledgment of Minor's Duties and Hours of Employment Parental is filed with the work permit. **A response is not required.**

6. PERFORMANCE

No findings or concerns were identified in this section.

7. FISCAL INTEGRITY

No findings or concerns were identified in this section.

8. AUDIT REQUIREMENTS

No findings or concerns were identified in this section.

9. ONE STOP OPERATOR

No findings or concerns were identified in this section.

10. GENERAL

BWDA extends its thanks to the North Central LWDB monitoring staff for providing documents and support during the PY19 review. Should the monitoring team or other staff need additional support, please do not hesitate to contact the assigned analyst for the local area.

BWDA would like to acknowledge that the program staff in North Central are embracing the use of the electronic IEP/ISS and have, for the most part based on the files reviewed, been consistently updating them with progress notes and changes to goals.