A review was completed on April 5, 2018.

PROGRAM REVIEW

Resulted in one finding and seven areas of concern. Technical assistance was provided for the finding, which has since been resolved through training and process changes. Technical assistance was provided in relation to the areas of concern while the review team was on site. Five promising practices were identified.

**Finding #1:** The Support Service Policy 5.34 in the WIOA manual was not being followed to determine the allowable amount of transportation assistance. As a result, transportation assistance was not provided on a fair and equitable basis to participants.

**Area of Concern #1:** Intake and Orientation Policy 5.5: Several files were found to have intake forms from prior enrollment periods being used for current enrollments.

**Area of Concern #2:** Case Notes Policy 5.3: Timely and content. Several files were found to have notes dated beyond the 2 days as per policy. And the notes lacked information.

**Area of Concern #3:** Utilize the Employment Plan in SDWORKS and update (See Policy 4.1). Several files reviewed did not contain employment plans or were not followed up on for completion dates, or additional objectives to assist the participant along their path.

**Area of Concern #4:** Basic Skills Deficient (BSD) Policy 4.8. Several files did not have BSD marked in SDWORKS.

**Area of Concern #5:** Enrollment to the greatest extent possible (See Policy 3.14). Many files were not co-enrolled. Technical assistance was given following the review on how to co-enroll accurately.

**Area of Concern #6:** Initial Assessment Policy 4.9: Several files did not contain an initial assessment summary in the case notes.

**Area of Concern #7:** Employment Plan Policy 4.11. Several files did not contain an unwritten plan in their notes of the goals and steps to assist the participants to achieve their goals.

**Promising Practices**

- Huron has gone out to the Huron High School and met with a group of Karen students who are meeting with staff to become enrolled.
- Huron has a strong summer youth program each year.
- Huron has a partnership with Drug Court to reach those individuals associated with court and chemical dependency issues.
- Quarterly partner meetings have been established and are thriving. This group meets quarterly and includes both WIOA required partners and community partners. The group discusses services offered, service gaps, and potential solutions to meet these gaps.
- The Job Search Assistance Program and Financial Literacy are offered as half day programs. Staff were encouraged to be creative with the structure of these to meet their customer’s needs.
EQUAL OPPORTUNITY REVIEW
Resulted in no findings and three opportunities for improvement. Two promising practices were identified.

**Improvement Opportunity #1: EO Coordinator Responsibilities (Element 1: Designation of EO Officer)**
With the transition from the old Equal Opportunity Methods of Administration to the new NDP, staff have had minimal Equal Opportunity training.

**Improvement Opportunity #2: Equal Access (Element 4: Universal Access)**
Based on responses in the monitoring tool and during the on-site interview with an employment specialist, Huron Job Service staff are not aware of the relay service (Relay SD) we use to ensure equal access for clients who are deaf, hard-of-hearing, deaf-blind, and/or speech-disabled.

**Improvement Opportunity #3: Outreach Using Demographic Analysis (Element 4: Universal Access)**
Huron Job Service collects demographic data on individuals they serve but they do not analyze the data or compare it to U.S. Census Bureau demographic data to determine if there is a need to improve outreach to ensure an equivalent level of information regarding aid, benefits, services, and training is provided to all demographic groups, including: both sexes, various racial and ethnic groups, individuals with disabilities, and different age groups. The registered to enrolled (favored outcome) analysis by race, which compared Caucasian (favored group) and Asian (unfavored group) resulted in a standard deviation of 1.91. In this analysis, a 2.0 or greater would indicate a probability discrimination exists. While the 1.91 is below the 2.0, it does indicate an opportunity to improve on enrolling Asian participants.

Huron Job Service staff conducts outreach to the Hispanic and Karen populations in the Huron school system using demographic data the school provides (See Appendix I: Huron High School Demographic attached to this report).

**Promising Practices**
- Huron Job Service uses demographic data provided by Huron High School to develop outreach to students.
- Huron Job Service partners with Vocational Rehab and Cornerstones to provide equal access to individuals who are Limited English Proficient and who are deaf, hard-of-hearing, deaf-blind, and/or speech-disabled.

AMERICANS WITH DISABILITIES ACT REVIEW
Resulted in one high effort finding, one medium effort finding, and four low effort findings.

**Finding – Low Effort**
The main van accessible parking spot on the south edge of the parking lot is not identified with a “van accessible” handicap parking sign.

**Finding – Low Effort**
The lobby area light switch at the front of the lobby is blocked by chairs and a brochure display.

**Finding – Low effort**
Access to public table and public computers in lobby area does not meet 36” width requirement.

**Finding – Low effort**
The restroom doors closed at a rate faster than the ADA required 5 seconds from a 90 degree opening to 12 degrees from the latch. The men’s room door closed in 3 seconds and the women’s room door closed in 4 seconds.

**Finding – Medium Effort**
The access aisle for the van accessible parking spot (south side of parking lot) is not designated or striped correctly.
Finding – High effort:
The client service counter does not have an accessible area that is a minimum 36” wide and a maximum 36” high when measured from the floor.

Suggested Recommendations for Improvement:

Program Review: When policy memos are released, review them as a team. Train all staff on these policies to increase their knowledge and comfort level in learning new programs. Ensure American Job Center brand is displayed on the front door.

Equal Opportunity Review: Complete the improvement training and outreach opportunities identified in the Equal Opportunity review. Seek assistance from the One Stop Operator or DLR Equal Opportunity Officer as needed.

Americans with Disabilities Act Review: Complete the low and moderate effort items identified for the Americans with Disability Act review. When the office is remodeled the high effort adjustment can be made. Seek assistance from the One Stop Operator or Administrative Services Division as needed.

Continue with American Job Center Affiliate Site Certification.

MITCHELL JOB SERVICE

A review was completed on April 12, 2018.

PROGRAM REVIEW

Resulted in seven areas of concern. Technical assistance was provided in relation to the areas of concern while the review team was on site. Two promising practices were identified. No findings were identified, a response is not required.

Area of Concern #1: Case Notes for Services (See Policy 5.3) – Timely and Content-Several files were found to be lacking notes or have notes that were input later than the policy of 2 days. Content of notes were not specific.

Area of Concern #2: Utilize Employment Plan in SDWORKS and Update (See Policy 4.1)-Many of the employment plans were not signed by the participant, and or not completed.

Area of Concern #3: Monitors for Training Services (See Policy 5.8) – Initial monitor in-person with participant and monthly monitors via phone, email or in-person. Many files did not contain a monthly monitor, especially noted in files of those receiving an Occupational skills training.

Area of Concern #4: Initial Assessment (See Policy 4.9). Some of the files that were reviewed did not contain an initial assessment, which is an important part of the determination process.

Area of Concern #5: Employment Plan for Wagner-Peyser participants (See Policy 4.11). Many of the files that were reviewed did not contain an employment plan; goals and steps (objectives) necessary to assist the participant in achieving their ultimate goal.

Area of Concern #6: Intake forms. Some of the files reviewed did not have the participant intake forms scanned and uploaded into SDWORKS.
**Area of Concern #7:** Authorization of Release of Information. Many of the files reviewed did not have the boxes checked on the Authorization (Form 1). The participants had signed a blank page, which signifies that they had seen the form, but not given permission to release information that may be valuable to obtaining employment.

**Promising Practices**

- Job Club is offered to participants weekly. Staff in the office rotate hosting job club topics based on their strengths and preferences.
- A bell has been hung to ring whenever someone obtains employment or has a significant achievement. This increases morale of those you work with a fun reminder for everyone in your office of why they do the work they do.

**EQUAL OPPORTUNITY REVIEW**

Resulted in no findings and three opportunities for improvement. One promising practice was identified.

*Improvement Opportunity #1: EO Coordinator Responsibilities (Element 1: Designation of EO Officer)* With the transition from the old Equal Opportunity Methods of Administration to the new NDP, staff have had minimal Equal Opportunity training.

*Improvement Opportunity #2: Equal Access (Element 4: Universal Access)*

Based on responses in the monitoring tool and during the on-site interview with an employment specialist, Mitchell LO staff are not aware of the relay service, Relay SD, used to ensure equal access for clients who are deaf, hard-of-hearing, deaf-blind, and/or speech-disabled.

*Improvement Opportunity #3: EO Outreach Using Demographic Analysis (Element 4: Universal Access)*

Mitchell collects demographic data on individuals they serve but they do not analyze the data or compare it to US Census Bureau demographic data to determine if there is a need to improve outreach to ensure an equivalent level of information regarding aid, benefits, services, and training is provided to all demographic groups, including: both sexes, various racial and ethnic groups, individuals with disabilities, and different age groups. The Population Demographic to Population Served analysis by age resulted in a standard deviation of 3.95. In this analysis, a 2.0 or greater would indicate a probability discrimination exists. While the result would indicate a probability of discrimination, it was determined discrimination was not present. The following considerations were considered in the determination:

- **Data:** The data used was US census data from the 2010 Census. For the favored group I used age 10-39 and for unfavorable group age 40-85. What the data does not consider is what individuals are seeking Title I services (i.e., similar to the unemployment rate statistic, which only considers individuals actually seeking a job). The question was asked, "What would the percent of individuals age 70 years old or older actually be seeking a Title I services.

While it was determined no discrimination was present, the result indicated Mitchell Job Service can improve their Outreach plan to focus on reaching more individuals who are 40 years old and older.

**Promising Practice**

Mitchell Job Service partners with Vocational Rehab and Cornerstones to provide equal access to LEP individuals and individuals who are deaf, hard-of-hearing, deaf-blind, and/or speech-disabled.

**AMERICANS WITH DISABILITIES ACT REVIEW**

Resulted in one high effort finding, three medium effort finding, and three low effort findings.
Finding – Low Effort
There is insufficient access space under the front reception desk for wheelchair accessibility.

Finding – Low Effort
The fire extinguisher on the back wall protrudes more than 4” from the wall and the bottom leading edge is higher than 27” from the floor.

Finding – Low Effort
Both the men’s and women’s restroom doors require more than 5 pounds of force to open (currently; men’s is 8 pounds and women's is 10 pounds).

Finding – Medium Effort
The left hand outside door (looking at the building from outside) requires 15 pounds of force to open from the inside. The door is rubbing against the adjacent door causing the extra effort.

Finding – Medium Effort
The main van accessible parking spot on the left-hand side of the main entrance is not identified with a “van accessible” handicap parking sign and needs to be designated with striping as a Handicap Parking area.

Finding – Medium Effort
The access aisle for the van accessible parking spot (directly in front of the main access door) is not designated with adequate striping.

Finding – High Effort
The handicap equipped water closet stalls in both the men’s and women’s restrooms do not have the ADA required width of 56” to meet the 1991 ADA standards. Currently they are only 36” wide. Also, because of the inadequate width there is not a 36” grab bar installed behind either stool.

Suggested Recommendations for Improvement:

Program Review: When policy memos are released, review them as a team. Train all staff on these policies to increase their knowledge and comfort level in learning new programs. Ask questions of the appropriate Labor Program Specialist as needed for clarification.

Equal Opportunity Review: Complete the improvement training and outreach opportunities identified in the Equal Opportunity review. Seek assistance from the One Stop Operator or DLR Equal Opportunity Officer as needed.

Americans with Disabilities Act Review: Complete the low and medium effort items identified for the Americans with Disability Act review. When the office is remodeled the high effort adjustment can be made. Seek assistance from the One Stop Operator or Administrative Services Division as needed.

Continue with American Job Center Comprehensive Site Certification.

SIOUX FALLS JOB SERVICE

A review completed on June 6, 2018.

PROGRAM REVIEW
Resulted in eight areas of concern. Technical assistance was provided in relation to the areas of concern while the review team was on site. One promising practice was identified. No findings were identified, a response is not required.

Area of Concern #1: Case Notes Policy 5.3: Timely and content. Several files were found to have notes dated beyond the 2 days as per policy. And the notes lacked information.
**Area of Concern #2:** Job Search Planning Service 121: Job search planning service was found in multiple files as a catch-all for services. Staff is not utilizing the Services Chart to determine appropriate service.

**Area of Concern #3:** Provision of Labor Market Information: Provision of labor market information service was found in multiple files as a catch-all for services. Staff is not utilizing the Services Chart to determine appropriate service.

**Area of Concern #4:** Initial Assessment: Some of the Wagner-Peyser files that were reviewed did not contain an initial assessment, which is an important part of the determination process.

**Area of Concern #5:** Intake Forms: Some of the files did not have the intake forms scanned and uploaded into SDWORKS or the forms were from prior participation periods. Some of the EEO forms did not contain an Employment Specialist signature.

**Area of Concern #6:** Authorization of Release of Information: Some of the ROI forms reviewed did not have the boxes checked on the Authorization (Form 1). The participants essentially had signed a blank page, which signifies that they had seen the form, but not given permission to release information that may be valuable to obtaining employment.

**Area of Concern #7:** Intake Forms: Some of the files contained intake forms from prior participation periods. Some of the EEO forms did not contain an Employment Specialist signature.

**Area of Concern #8:** Understanding of WIOA Eligibility: One of the Wagner-Peyser files reviewed contained a case note stating that the individual was “referred to WIOA but she is over income”.

**Promising Practice**

Several of the files reviewed for Wagner-Peyser were individuals in re-employment status. The case notes for res were very descriptive in documenting the individual’s personal situation, the reason for seeking services and an informal employment plan. These are the types of case notes we want to see for all individuals, regardless of program.

**EQUAL OPPORTUNITY REVIEW**

Resulted in no findings and two opportunities for improvement. One promising practice was identified.

**Improvement Opportunity #1: Equal Access (Element 4: Universal Access)**

During the onsite review, three employment specialists were interviewed on their knowledge of providing equal services to all individuals. Staff interviewed did not have the resources readily available in their work area for auxiliary aids used to communicate with Limited English Proficiency (LEP), deaf, hard-of-hearing, deaf-blind, and or speech disabled. There were also indications that some staff is unaware of the auxiliary aid SD Relay we use to provide services to individuals who are deaf, hard-of-hearing, deaf-blind, and or speech disabled.

**Improvement Opportunity #2: Outreach Using Demographic Analysis (Element 4: Universal Access)**

Sioux Falls Job Service does limit to no demographic analysis of the population they serve. Demographic analysis is used to develop effective outreach to ensure an equivalent level of information regarding aid, benefits, services, and training is provided to all demographic groups, including both sexes, various racial and ethnic groups, individuals with disabilities, and different age groups.

**Promising Practice**

Sioux Falls Job Service partners with Vocational Rehab and Lutheran Social Services to provide equal access to individuals who are Limited English Proficient and who are deaf, hard-of-hearing, deaf-blind, and/or speech-disabled.
AMERICANS WITH DISABILITIES ACT REVIEW
Resulted in three high effort finding, one moderate effort finding, and eight low effort findings.

Approach and Entrance

Finding – Low Effort
The entrance doors to the DSS side close faster than the ADA standard of 5 seconds. Actual is 4 seconds.

Finding – High Effort
The slope of accessible parking spaces and access aisles on DLR side is steeper than 1” : 48”. Actual is 2” : 48”.

Finding – High Effort
The slopes on the curb ramp on the DSS side are greater than ADA standard of 1” : 12”. Actual is 2” : 12”.

Access to Goods and Services

Finding – Low Effort
The fire extinguisher protrudes more than 4” in the circulation path in the DLR Office.

Finding – Low Effort
The whiteboard and the TV shelf in the SBVI Conference Room protrude into walkway more than 4” and are higher than 27” above the floor.

Finding – Low Effort
Signs designating permanent rooms (conference rooms) unlikely to change over time do not have raised letters or Braille interpretation. They are also higher than the ADA standard of 60”. Actual is 63”.

Finding – Moderate Effort
The clear floor space under the accessible portion of the reception counter does not extend at least 17” back. Actual measurement is 4”.

Public Restrooms

Finding – Low Effort
The operable part of the changing stations in the men’s and women’s restrooms are too high.

Finding – Low Effort
Objects above grab bar in men’s and women’s restroom are too close to grab bar.

Finding – Low Effort
Toilet paper dispenser in men’s and women’s restrooms are not 7” to 9” in front of the toilet as measured from the centerline of the dispenser.

Finding – Low Effort
The toilet seat in both men’s and women’s restrooms are less than the minimum 17” to maximum 19” height.

Staff Restrooms

Findings – High Effort
There are numerous issues with non-compliance in the staff restrooms (see October 2017) findings from the DSS Consultants ADA Review.
Suggested Recommendations for Improvement:

**Program Review:** When policy memos are released, review them as a team. Train all staff on these policies to increase their knowledge and comfort level in learning new programs. Ask questions of the appropriate Labor Program Specialist as needed for clarification.

**Equal Opportunity Review:** Complete the improvement training and outreach opportunities identified in the Equal Opportunity review. Seek assistance from the One Stop Operator or DLR Equal Opportunity Officer as needed.

**Americans with Disabilities Act Review:** Complete the low and medium effort items identified for the Americans with Disability Act review. When the office is remodeled the high effort adjustment can be made. Seek assistance from the One Stop Operator or Administrative Services Division as needed.

Continue with American Job Center Affiliate Site Certification.