

## WATERTOWN JOB SERVICE

A review was completed on June 3-4, 2019.

### PROGRAM REVIEW

The program review of Watertown Job Service resulted in three findings and seven areas for concern. Technical assistance was provided to the finding and areas of concern. No promising practices were identified.

**Finding #1:** Employment Plan Policy 4.11 requires a signed Employment Plan be provided to the participant and uploaded into SDWORKS. Multiple files did not have an Employment Plan signed and uploaded into the system. Multiple files did not have objectives in the Employment Plan, or the objectives were not broken down into steps to reach the goal.

**Finding #2:** Case Notes Policy 5.3 provides examples of quality case notes. Case notes must be timely and entered within two working days from the date of contact. Based on the review, multiple files did not adhere to the Case Note Policy by entering the name of the service provided and completing case notes on a timely basis.

**Finding #3:** Several individuals who should have been co-enrolled in the Title I Adult and Title I Youth program did not have a program service entry for the Title I Adult program. Based on Youth Eligibility Policy 4.3, through the WIOA Youth enrollment process, Adult participation will be triggered for those over the age of 18 by staff entering the services identified in the Youth enrollment process under the SDWORKS Adult application.

**Area of Concern #1:** When entering services, there is no need to enter duplicative services under different customer groups on the same day. As we find out more about TAA, this may be different.

**Area of Concern #2:** Staff should take credit for services provided.

**Area of Concern #3:** Staff are not tagging uploaded documents appropriately, which makes it difficult to find necessary documents.

**Area of Concern #4:** On-the-Job Training (OJT) monitors must be completed monthly per OJT Policy 5.28.

**Area of Concern #5:** Selective Service Policy 4.6 addresses the requirement for Selective Service registration. One file was found to not have the Selective Service registration uploaded or verified.

**Area of Concern #6:** Utilizing Alternative Contacts in SDWORKS for Follow Up Services.

**Area of Concern #7:** Develop an informal Employment Plan with participants if they are not enrolled into Title I per Policy 4.11.

### EQUAL OPPORTUNITY REVIEW

The Equal Opportunity review of Watertown Job Service resulted in two findings and three areas of concern. Technical assistance was provided in relation to the opportunities for improvement. No promising practices were identified.

**Finding #1: LEP Data Collection (Element 6: Data and Information Collection and Maintenance)**

As of January 3, 2019, all One-Stop Career Centers are required to record the Limited English Proficiency (LEP) and preferred language of each applicant, registrant, participant, and terminnee (29 CFR 38.41). DLR is currently

working with GeoSol, Inc. to update SDWORKS to collect the data. As of now, at no fault of their own, One-Stop Career Centers are not collecting the LEP data.

***Finding #2: Disability Related Information (Element 6: Data and Information Collection and Maintenance)***

The Watertown staff do not keep disability information separate from other information. In review of case notes, only one instance of case notes included disability information about a participant. 29 CFR 38.41 (b) (3) states 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 must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential and secured (for example, through password protection).

***Area of Concern #1: Equal Services (Element 4: Universal Access)***

On-site staff interviews indicated a need for training on providing equal services to LEP, deaf, hard-of-hearing, deaf-blind, and speech disabled individuals. Staff do not have the contact information for Language Link or SD Relay readily available in their work area. While staff rarely work with these individuals, it is important to be prepared and know the process for providing equal services.

***Area of Concern #2: Affirmative Outreach (Element 4: Universal Access)***

The desk review data analysis indicated an opportunity to improve outreach and increase the services to individuals protected from age discrimination (40 years old and older). The first analysis focused on the effectiveness of influencing the protected classes to participate in the services provided. This was done by comparing the population demographic of the area served to the population served. The second data analysis focused on foot traffic and the effectiveness of a favored result for the protected classes, enrollment in WIOA Title I. This was done by comparing enrollment in Wagner-Peyser Title III to enrollment in WIOA Title I.

The data analysis comparing the population demographic of the area served to the population served by age resulted in a standard deviation of 3.82. A standard deviation of two or higher represents a less than 5% chance the results are due to chance. The data analysis comparing registered to enrolled by age resulted in a standard deviation of 4.20. These results indicate a probability of discrimination both in outreach efforts and in providing services to individuals protected by age. However, the case file review and interview did not show any indication of discrimination.

***Area of Concern #3: Adequate Training (Element 1: Designation of EO Coordinator)***

The Watertown Job Service on-site review indicated WIOA Title I Non-Discrimination Plan training is needed for staff.

## **AMERICANS WITH DISABILITIES ACT**

The Americans with Disabilities Act (ADA) review of Watertown Job Service resulted in one high effort finding, three medium effort finding, and five low effort findings.

***Finding – High Effort***

The reception counter height does not meet the ADA standards of 36 inches high. The height of the reception counter is 45 inches.

***Finding – Medium Effort***

The parking access aisles are marked but faded.

***Finding – Medium Effort***

There are no braille signs for the Resource Rooms.

***Finding – Low/Medium Effort***

The van accessible parking space signs reading “van accessible” need to be replaced and positioned at least 60 inches above the ground.

***Finding – Low Effort***

Objects on circulation paths may not protrude more than four inches into the path, per ADA standards. The fire extinguisher protrudes 4.5 inches into the path with a tactical warning.

***Finding – Low Effort***

Coat hooks located on restroom doors cannot be lower than 15 inches and no higher than 48 inches above the floor. Coat hooks located in the women’s restroom are 60 inches above the floor.

***Finding – Low Effort***

Pipes below the restroom sinks are not insulated or otherwise configured to protect against contact.

***Finding – Low Effort***

The restroom doors must be easily opened with five pounds or less of actual force. The men’s restroom door is nine pounds and the women’s restroom door is 10 pounds.

**CONTINUED ADA EFFORTS**

Continue to work with the landlord and property management maintenance staff to resolve two low effort findings in the restrooms: coat hook relocation and pipe coverage.

## BROOKINGS JOB SERVICE

A review was completed on June 4-5, 2019.

### PROGRAM REVIEW

The program review of Brookings Job Service resulted in four findings and nine areas for concern. Technical assistance was provided to the finding and areas of concern. No promising practices were identified.

**Finding #1:** Case Note Policy 5.3 states that case notes should contain objective information, such as; behaviors reported by the participant or partner agency, record statements made by customer, record factual observations, assessment results, considering: who, what, when, where, why and how. Case note should not include “I think” or opinions.

**Finding #2:** Employment Plan Policy 4.11 requires Employment Plans include a goal and objectives. Objectives are the breakdown of the larger goal into steps to reach the goal.

**Finding #3:** Case Notes Policy 5.3 outlines quality case note contents. Case notes must be timely and entered within two working days from the date of contact. Based on the review, multiple files did not adhere to the Case Note Policy by entering the name of the service provided or completing notes on a timely basis.

**Finding #4:** Assessment Policy 4.9 indicates files must have an initial and objective assessment. Several files did not contain these assessments.

**Area of Concern #1:** When enrolling an individual as a youth over the age of 18, staff must also enroll them as a Title I Adult. Staff will trigger a service within the Title I application in SDWORKS under the adult section in order to co-enroll. Youth Eligibility Policy 4.3 states, “Through the WIOA Youth enrollment process, an Adult participation will be triggered for those over the age of 18 by staff entering the services identified in the youth enrollment process under the SDWORKS Adult application.”

**Area of Concern #2:** Data entry into SDWORKS is necessary for data validation and reporting. Several files in SDWORKS did not contain the verifying document even though the files indicated receipt of the verifying document.

**Area of Concern #3:** Participant’s Measurable Skills Gains were not entered in SDWORKS, thus not reported.

**Area of Concern #4:** Staff did not follow the Basic Skills Deficient Policy 4.8. Basic skills deficient was not always recorded within SDWORKS.

**Area of Concern #5:** Staff should take credit for services provided.

**Area of Concern #6:** Staff were not tagging documents appropriately, which makes it difficult to find necessary documents.

**Area of Concern #7:** On-the-Job Training (OJT) monitors must be completed monthly per policy 5.28.

**Area of Concern #8:** Selective Service policy 4.6 addresses the requirement for Selective Service registration. One file was found to not have the registration uploaded nor verified.

**Area of Concern #9:** Utilizing Alternative Contacts in SDWORKS for follow up purposes.

## **EQUAL OPPORTUNITY REVIEW**

The Equal Opportunity review of Brookings Job Service resulted in two findings and three areas of concern. Technical assistance was provided in relation to the opportunities for improvement.

### ***Finding #1: LEP Data Collection (Element 6: Data and Information Collection and Maintenance)***

As of January 3, 2019, all One-Stop Career Centers are required to record the Limited English Proficiency (LEP) and preferred language of each applicant, registrant, participant, and terminee (29 CFR 38.41). DLR is currently working with GeoSol, Inc. to update SDWORKS to collect the data. As of now, at no fault of their own, no One-Stop Career Center is collecting the LEP data.

### ***Finding #2: Disability Related Information (Element 6: Data and Information Collection and Maintenance)***

The Brookings staff do not keep disability information separate from other information. Reviewing case notes, four out of nine files reviewed had instances disability information about a participant was recorded in case notes. 29 CFR 38.41 (b) (3) states *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 must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential and secured (for example, through password protection).*

### ***Area of Concern #1: Equal Services (Element 4: Universal Access)***

The on-site interviews of Brookings staff indicated a need for training on providing equal services to LEP, deaf, hard-of-hearing, deaf-blind, and speech disabled individuals. Staff do not have the contact information for Language Link or SD Relay readily available in their work area. While the Brookings office rarely works with these individuals, it is important to know the process for providing equal services and be prepared.

### ***Area of Concern #2: Affirmative Outreach (Element 4: Universal Access)***

The desk review data analysis indicated an opportunity to improve outreach and increase the services to individuals protected from age discrimination (40 years old and older). The first analysis focused on the effectiveness of influencing the protected classes to participate in the services provided. This was done by comparing the population demographic of the area served to the population served. The second data analysis focused on foot traffic and the effectiveness of a favored result for the protected classes, enrollment in WIOA Title I. This was done by comparing enrollment in Wagner-Peyser Title III to enrollment in WIOA Title I.

The data analysis comparing the population demographic of the area served to the population served by age resulted in a standard deviation of 1.72. The data analysis comparing registered to enrolled by age resulted in a standard deviation of 3.60. A standard deviation of two or higher represents a less than 5% chance the results are due to chance. These results indicate the Brookings Job Service is providing adequate services to the population they serve but have concerns with the ratio of individuals 40 being enrolled in WIOA services compared to individuals under 40 being provided WIOA services. If you look at the supporting documentation below, you will see the ratio for enrolling in Wagner-Peyser is 58% under 40 and 42% 40 and older. However, when you look at enrolled in WIOA the ratio for 40 and over drop drastically – only 26% are enrolled in WIOA.

### ***Area of Concern #3: Adequate Training (Element 1: Designation of EO Coordinator)***

The Brookings Job Service on-site indicated a need for training on the WIOA Title I Non-Discrimination Plan.

## **AMERICANS WITH DISABILITIES ACT**

The Americans with Disabilities Act (ADA) review of Brookings Job Service resulted in three high effort findings, one medium effort finding, and seven low effort findings.

### ***Finding – High Effort***

Per ADA standards, the slope of the accessible parking spaces and access aisles are to be no steeper than 1:48 in all directions. Slopes measured four inches in 48 inches.

***Finding – High Effort***

The vertical threshold measured at approximately one inch wide and one inch deep. The threshold needs to be no more than ¼ inch high.

***Finding – High Effort***

When restrooms are remodeled, ensure place of water closet is correct to the current ADA standard of no less than 16 inches and no greater than 18 inches from the side wall or partition. Currently, the men’s water closet measures at 24 inches and the woman’s measures at 21 inches.

***Finding – Medium Effort***

Parking lot access aisles need repainted to discourage parking.

***Finding – Low Effort***

Handicap parking signs must be installed so the bottom of each sign is at least 60 inches above the ground.

***Finding – Low Effort***

All doors must take at least five seconds to close from an open position of 90 degrees to a position of 12 degrees from the latch. The buildings east door

***Finding – Low Effort***

Ensure all objects on the circulation paths through the public areas, e.g. fire extinguishers, protrude no more than four inches into the path.

***Finding – Low Effort***

Install braille signs to designating a permanent room (not likely to change over time), no higher than 60 inches to the centerline of the sign.

***Finding – Low Effort***

Adjust the restroom doors so it can be opened with a maximum of 5 pounds force?

***Finding – Low Effort***

Adjust coat hooks in the restrooms to no less than 15 inches and no higher than 48 inches above the floor.

***Finding – Low Effort***

Replace broken locks in restrooms so they can be operable with one hand without tight grasping, pinching, or twisting of the wrist.

**CONTINUED ADA EFFORTS**

Continue to work with the property owner to finish parking lot replacement, which will resolve identification of access aisles, slope of accessible parking spaces, and placement of handicapped parking spaces. Continue communications with the property owner to resolve the gap between the sidewalk and door. Follow up with maintenance staff to ensure restroom updates are made including coat hook replacement, proper placement of the restroom stall, and replace broken locks in compliance with ADA standards.