

# Workforce Development Council ONE-STOP CENTER CERTIFICATION REVIEW

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To ensure the One-Stop delivery system meets minimum quality standards in accordance to the Workforce Innovation and Opportunity Act (WIOA), the South Dakota Workforce Development Council (WDC) has developed One-Stop Career Center certification criteria. This standard certification criterion promotes the objectives of South Dakota's WIOA State Plan. The WDC is authorized to certify South Dakota One-Stop Career Centers. Refer to One-Stop Career Center Certification Policy 3.3 for more information



# **PROGRAM REVIEW**

**FINDING #1:** Case Notes Policy 5.3 requires the body of the case note describes service(s) and the description in the case note matches service(s) reported. Based on the review, some files did not have case notes that described the services reported. These creates the possibility for failing data validation for these services in the future. Case notes should also be timely. Based on the review, some files had case notes entered a month after the service was provided. It was also noted that there are often duplicate case note entries for different programs. For example, one Objective Assessment case note for a 204 Objective Assessment and the same case note for the VO2 Vets-Objective Assessment. This duplication is not necessary.

Completed on October 5, 2022

**RESOLUTION** 

**Required Action #1:** Review Policy 5.3 Case Notes as a team. Return a signed attendance sheet from this policy review. In addition, return the participant name, state ID, and case note date of one participant file from each Employment Specialists in your office. This case note will be reviewed to ensure compliance with Policy 5.3. In addition, it is recommended your team review the Case Note training that is now available in the Learning Management System.

**FINDING #2:** Per Policy 5.5 Intake and Orientation, Forms 1, 2, and 3 need to be completed before enrollment into any Title I or Title III (Wagner-Peyser program). Once the forms are completed and signed, they should be uploaded into the document management system. During the file review, there were many files that did not have the intake forms. Policy 8.20 Document Management, provides additional details related to naming and tagging documents.

**Required Action #2:** Review Policy 5.5 Intake and Orientation and 8.20 Document Management as a team. Return a signed attendance sheet from this policy review. In addition, return the participant name and state ID of one participant file from each Employment Specialists in your office. This file will be reviewed to ensure compliance with Policy 5.5.

Completed on July 27, 2022

**FINDING #3:** Policy 4.6 Selective Service states that all males born on or after January 1, 1960 must present documentation showing compliance with the Selective Service registration requirement to be eligible for Title I services. During the review, many files were missing Selective Service documentation. (Policy 4.6 provides instruction for obtaining the appropriate verification.)

**Required Action #3:** Review Policy 4.6 Selective Service as a team. Return a signed attendance sheet from this policy review. Review active files of males over the age of 18 to identify files missing selective service registration. Return a list of files missing selective service registration. Upload missing verification to the participant's Document Management section. WIOA Policy 8.20 Document Management may be of assistance.

Completed on July 17, 2022

**FINDING #4:** Policy 5.60 Reemployment Services requires the Subsequent Follow-up be completed at the first revision of the Employment Plan. This policy also identifies the need to report non-compliance with requirements of the Reemployment Assistance (RA) program or the Reemployment Services Eligibility and Assessment (RESEA) program to the RA Division. The review team noted RESEA files lacking a subsequent review despite participation in the program beyond four weeks. In addition, files

demonstrating non-compliance did not show indication of a report being place to the RA Division.

**Required Action #4:** Review Policy 5.60 Reemployment Services as a team. Return a signed attendance sheet from this policy review. The Aberdeen Office will participate in weekly check-ins with the RA Labor Program Specialist for a period of four weeks to ensure requirements are adopted consistently. Attendance will be documented.

Completed on July 27, 2022

**FINDING #5:** Policy 4.8 Basic Skills Deficient and Policy 4.9 Assessments were not being followed as many files were missing assessments required to determine basic skills deficient and needs for additional services or the assessment were not within the allowable date range of six months prior to enrollment or 60 days after enrollment.

**Required Action #5:** Review Policy 4.8 Basic Skills Deficient and Policy 4.9 Assessments as a team. Return a signed attendance sheet from this policy review. Provide a statement of how the office will implement the required basic skills assessment testing.

Completed on July 27, 2022

**FINDING #6:** Many files had case notes indicating measurable skills gains, however, these were not properly documented so they could be reported and included in performance.

**Required Action #6:** Review Policy 6.4 Credentials and Measurable Skills Gains (MSG) and the related Data Entry Guide as a team. Return a signed attendance sheet from this policy review. Provide a screen shot from the SDWORKS UAT site providing verification of data entry of a sample MSG.

Completed on July 27, 2022

**FINDING #7:** Reviewers indicated employment plans were not updated and signed, including on a Youth Inventive obligation. The lack of a signature on a youth inventive obligation, can result in questioned costs.

**Required Action #7:** Review the <u>Data Entry Guide</u> for Youth Incentives as a team. Return a signed attendance sheet from this review. Carbon copy the Youth Labor Program Specialist on all youth incentive obligation approvals for 30 days from the date of this review letter.

Completed on July 27, 2022

# AMERICANS WITH DISABILITIES ACT (ADA)

**FINDING #1:** If there is a full size or LULA elevator: Is there a sign on both door jambs at every floor identifying the floor? Do text characters contrast with their background? Are text characters raised?

**RESOLUTION** 

**ADA Required Action #1:** Order and install floor numbers with braille and tactile stars for both floors.

Completed on July 27, 2022

**FINDING #2:** Is the door equipped with hardware that is operable with one hand and does not require tight grasping, pinching or twisting of the wrist?

**ADA Required Action #2:** Replace knob style door handles through-out the office with lever style door handles.

Completed on July 27, 2022

ADA Required Action #3: Adjust or replace closers.

Completed on July 27, 2022

# **EQUAL OPPORTUNITY (EO)**

#### FINDING #1:

# **Local Equal Opportunity Coordinator (Element 1)**

Aberdeen local office manager does not provide adequate EO related training to the job service staff. During the Aberdeen review, it was indicated the local office manager does not provide EO training to her staff. The training they receive is limited to the training provided by the EO Officer, Derek Gustafson. This is a repeat area of concern form the May 2020 review.

29 CFR 38.31 (f) states in part the EO coordinator must provide ongoing training to maintain competency of staff.

Required Action #1: One of the key responsibilities of the local EO coordinator (Local Office Manager) is to ensure job service office staff are adequately trained on EO related categories including providing accommodations for individuals with disabilities and the complaint process. An Equal Opportunity resource page, located on the Field Operations SharePoint site, was first published May of 2020 to provide local office managers the necessary tools and resources to train their staff. The resource page includes training on LEP, providing accommodations for individuals with disabilities, DLR's medical and disability data and information collection process and policy, and Language Assistance Plan. In addition to the trainings provided, there are also resources on how to use Language Links translator services, Relay SD information, and Language Links used for American Sign Language guide. Finally, the resource page includes links to additional training opportunities for staff including USD Center for Disabilities, JAN (Job Accommodation Network) events calendar, and LEAD Center.

The local office manager must review all of the EO resources found on the SharePoint site and begin highlighting a section on a monthly basis to staff during a weekly meeting. Staff must specifically be familiar with the compliant process and their role in the process, general understanding of accommodations available for individuals with disabilities (Referencing Voc Rehab is not an adequate response), knowledgeable of the Language Assistance Plan, familiar with the process of using Language Links for LEP individuals, and understand the process for collecting LEP data in SDWORKS.

#### FINDING #2:

# **Notice and Communication (Element 2)**

The Aberdeen office is not correctly uploading the EO is the Law form for participants receiving WP and WIOA services.

Four of the eight case files reviewed did not correctly upload the EO is the Law form. Two of the eight files reviewed did not have the 3 documents, including the EO is the Law form, uploaded and WP services were provided (Fausto Lopez Chilel and Naw Soe). Two of the eight files only had the signature page uploaded (Garrid Baldwin and Day Khi). The signature page references the acknowledgment of the first page and therefore the first page must also be uploaded.

WIOA Policy 5.5 Intake and Orientation states in part the Equal Opportunity (Form 2) must be explained to the participant and signed by the participant prior to enrollment into Title I or Title

#### **RESOLUTION**

Completed on August 23, 2022 III. The signed forms must be uploaded into SDWORKS.

29 CFR 38.36 (a) (4) states in part of the EO Notice must be provided to each participant and must be made part of his or her electronic file.

**Required Action #2:** Aberdeen manager must provide training on the requirements of uploading the entire EO is the Law form into SDWORKS for every participant receiving WP and WIOA services. The training must be documented and signed by all staff and provided to the EO Officer.

Completed on August 23, 2022

#### FINDING #3:

# Data and Information Collection and Maintenance (Element 6)

The Aberdeen office does not correctly document participants as LEP in SDWORKS under the self-registration section of the Wagner Peyser Barriers section. This is a repeat finding from the May 2020 review.

Three out of the eight case files reviewed (Day Khi, Kyaw Klay, and Fausto Lopez Chilel) has participants incorrectly classified as non-LEP in both the self-registration and Wagner Peyser Barriers tab when they should have been classified as LEP.

29 CFR 38.41 Collection and maintenance of equal opportunity data and other information, (b) (2) states in part, beginning January 3, 2019, each recipient must also record the limited English proficiency (LEP) and preferred language of each applicant, registrant, participant, and terminee.

29 CFR 38.4 Definitions (hh) Limited English proficient (LEP) individual means an individual whose primary language for communication is not English and who has limited ability to read, speak, write, and/or understand English. LEP individuals may be competent in English for certain types of communicate (e.g. speaking or understanding) but still be LEP for other purposes (e.g. reading or writing).

ADA Required Action #3: The current guidance for collecting LEP data is to answer the LEP questions found in the self-registration section. However, it has been discovered the LEP data collected in the self-registration section is not reportable. To report the LEP data, the information needs to be captured on the Wagner Peyser enrollment application under the Barriers tab with the English Language Learner question. The EO Officer will update the enrollment guide to add instructions to complete the English Language Learner question to document LEP data. The EO officer will create training in DLR's LMS on how to capture LEP data in the Wagner Peyser application.

The Aberdeen office will need to complete the training once it is published and review the updated Enrollment Guide covering the Barriers tab. The Aberdeen manager should monitor the participant enrollments to ensure staff are correctly documenting LEP data.

### FINDING #4:

# **Complaint Processing Procedures (Element 8)**

Aberdeen local office does not correctly follow the complaint process. This was an area of concern identified during the May 2020 review. During the manager interview, it was indicated the employee who processes most of the complaints, Peggy Foster was not aware of the complaint log. During the staff interview, Stacy Whitlock indicated all staff are responsible for handling complaints and referring the person filling the complaint to the correct agency (e.g. Human Rights Division). Stacy was not familiar with the process to log complaints.

20 CFR 658 – Employment Services Complaint System, section 410 – Establishment of local and State complaint systems, (c) states in part the manager of Employment Service office must ensure

Completed on August 23, 2022

a central complaint log is maintained, listing all complaints taken.

DLR Non-Discrimination Plan, Element 8, Exhibit A – DLR Discrimination Complaint Policy and Procedure states in part, Job Service employees' responsibilities for processing a compliant is to forward the complaint to the job service manager or designee. It is the job service manager (or designee) responsibility to refer complaints to the appropriate agency and document the complain on the complaint log.

**ADA Required Action #4:** All employment related complaints and job service complaints must be processed and logged by the local office manager or designee(s). The manager and/or designee(s) must be trained on the complaint process including everyone's role with processing complaints, referring to the correct agency, and the requirement of logging complaints.

Completed on August 23, 2022

The Equal Opportunity Officer will develop a training for both the manager/designee and staff in the DLR Learning Management System. Once the training is complete, all staff in the Aberdeen Job Service must take it.

<b>DLR RECOMMENDATION</b> DLR recommends continuing with the American Job Center Affiliate Site Certification for this location.			
Kendra Ringstmeyer, DLR Director of Workforce Services	Date		
<b>CERTIFICATION</b> The Workforce Development Council (WDC) recognizes the criteria Opportunity Act (WIOA) One-Stop Career Center Certification (OSC have been successfully completed. Therefore, the Monitor is closed approved through June 30, 2026.	C) Policy 3.3, has been met. All findings listed above		
Signed and approved by the undersigned on behalf of the Workford	ce Development Council Members.		
Lee Anderson, Chairman, Workforce Development Council	 Date		



# **PROGRAM REVIEW**

**FINDING #1:** Review <u>Policy 5.3 Case Notes</u> as a team. Return a signed attendance sheet from this policy review. In addition, return the participant name, state ID, and case note date of one participant file from each Employment Specialists in your office. This case note will be reviewed to ensure compliance with Policy 5.3. In addition, it is recommended your team review the Case Note training that is now available in the Learning Management System.

**Required Action #1:** Review Policy 4.8 Basic Skills Deficient and Policy 4.9 Assessments as a team. Return a signed attendance sheet from this policy review. Provide a statement of how the office will implement the required basic skills assessment testing.

**FINDING #2:** The Brookings Job Service Office has a half-time Disabled Veterans' Outreach Program (DVOP) assigned to their local office, yet no eligible veterans or individuals were served from July 1, 2021 – December 31, 2021. This would likely be at least a concern for VETS of not having any DVOP Case Managed veterans during this time frame. Although, when VETS audits local offices they will use an entire Program Year.

### Required Action #2:

- A. Schedule a plan with the LVER from Sioux Falls to provide the non-JVSG staff with training on the promotion of all veterans to employers. Joint outreach to businesses between the LVER and Brookings Job Service Office staff should be conducted.
- B. The Brookings Job Service Office manager and the DVOP will develop a training schedule with the JVSG Program Coordinator to receive one-on-one guidance in strategies to seek out individuals eligible for DVOP services.
- C. The Brookings Job Service Office manager will schedule one-on-one training for the JVSG Program Coordinator to provide the staff in the Brookings Office regarding identifying eligible veterans through the triage process and services to veterans.
- D. The DVOP will conduct outreach to service area including Brookings, Lake, Minor, and Moody Counties.
- E. The DVOP will connect the Madison Job Service Office to develop a method for eligible veterans to be connected to the DVOP for services.
- F. The Brookings Local Office will provide a monthly report of outreach efforts to the JVSG Program Coordinator until three eligible individuals are receiving JVSG services from the DVOP. The Program Coordinator will provide guidance and feedback as appropriate.

# **RESOLUTION**

Completed on July 22, 2022

A. Completed on July 22, 2022

B. Completed on July 22, 2022

C. Completed on October 5, 2022

D. Completed on July 22, 2022

E. Completed on July 22, 2022

F. Completed on July 22, 2022

# AMERICANS WITH DISABILITIES ACT (ADA)

**FINDING #1:** Spaces clearly signed and marked. Signs posted at least 60" above the ground. Signs reading "Van Accessible" at van accessible spaces.

#### **RESOLUTION**

**ADA Required Action #1:** Raise all Handicap parking signs so that the bottom of each sign is a minimum of 60" high.

Completed on October 5, 2022

**FINDING #2:** Is there a portion of the reception counter that is no high than 36" above the floor and at least 36" long?

**ADA Required Action #2:** Lower the reception surface on the right to the same height as the left side as discussed to create reception surface that is at least 36".

Completed on October 5, 2022

FINDING #3: Can the door be opened easily (5 pounds maximum force)?

**ADA Required Action #3:** Adjust door closers to require 5 lbs. of force or less to open. Currently the men's door requires 18 lbs. and the women's requires 16 lbs.

Completed on July 22, 2022

**FINDING #4:** If there is a coat hook, is it no less than 15 inches and no greater than 48 inches above the floor?

**ADA Required Action #4:** Lower coat hooks in both restrooms to 48". Currently they are at 60".

Completed on July 22, 2022

**FINDING #5:** Are the door pulls on both sides of the door operable with one hand and do not require tight grasping, pinching, or twisting of the wrist?

**ADA Required Action #5:** Replace door handles in both restrooms. (Pictures of suggested replacement below.)

Completed on October 5, 2022

**FINDING #6:** Is the lock operable with one hand and without tight grasping, pinching or twisting of the wrist?

ADA Required Action #6: Replace locks in both restrooms.

Completed on October 5, 2022

# **EQUAL OPPORTUNITY (EO)**

# FINDING #1:

# **Element 8: Complaint Processing Procedures**

Brookings local office does not correctly follow the complaint process. The Brookings office does not have complaints directed to the manager or designee and does not log any complaints – no complaints have been filed for an employment law or job service complaint for program year 2021.

During the manager interview, it was indicated complaints were not being directed to the manager or designee. During the staff interview it was indicated most complaints are being process by staff handling the phones (most complaints are taken by phone vs. in person). Jesse explained there are typically two or more complaints taken a month and that he had taken around 13 complaints himself this past year. Staff taking the complaints are not aware of the requirement to log the complaints.

20 CFR 658 – Employment Service Complaint System, section 410 – Establishment of local and State complaint systems, (c) states in part the manager of Employment Service office must ensure a central complaint log is maintained, listing all complaints taken.

DLR Non-Discrimination Plan, Element 8, Exhibit A – DLR Discrimination Complaint Policy and

# **RESOLUTION**

Procedure states in part, Job Service office employees' responsibilities for processing a complaint is to forward the complaint to the job service office manager or designee. It is the job service office manager (or designee) responsibility to refer complaints to the appropriate agency and document the complaint on the complaint log.

**Required Action #1:** All employment related complaints and job service office complaints must be processed and logged by the local office manager or designee. The manager and/or designee must be trained on the complaint process including everyone's role with processing complaints, referring to the correct agency, and the requirement of logging complaints. All Brookings job service staff must be trained on their role to direct complaints to the manager or designee.

Completed on July 8, 2022

The Equal Opportunity Officer will develop a training for both the manager/designee and staff in the DLR Learning Management System. Once the training is complete, all staff in the Brookings Job Service Office must take it.

DLR RECOMMENDATION		
DLR recommends continuing with the American Job Center Affiliate Site Certification for this location.		
Wester Bissels of BLB Bissels of West for a Continu		
Kendra Ringstmeyer, DLR Director of Workforce Services	Date	
CERTIFICATION		
The Workforce Development Council (WDC) recognizes the criteri	ia detailed in the Workforce Innovation and	
Opportunity Act (WIOA) One-Stop Career Center Certification (OS		
have been successfully completed. Therefore, the Monitor is close		
approved through June 30, 2026.		
Signed and approved by the undersigned on behalf of the Workfo	rce Development Council Members.	
Lee Anderson, Chairman, Workforce Development Council	 Date	



# **PROGRAM REVIEW**

No compliance findings were identified.

# **AMERICANS WITH DISABILITIES ACT (ADA)**

**FINDING #1:** Handicap spaces are clearly signed and marked. Signs need to be posted on at least 60" above ground. Signs reading "Van Accessible" at van accessible spaces.

**ADA Required Action #1:** Raise all handicap parking signs so that the bottom of each sign is a minimum of 60" high.

**FINDING #2:** If there is a front approach to the pull side of the door, there needs to be at least 18" of maneuvering clearance beyond the latch side plus at least 60" clear depth.

**ADA Required Action #2:** Move the cabinets and shelves in the Resource room and large Conference room to create the required 18" of clearance.

**FINDING #3:** Is the toilet paper dispenser located no less than 7" and no greater than 9" from the front of the toilet to the centerline of the toilet paper dispenser?

**ADA Required Action #3:** Relocate the toilet paper dispensers in both the men's and women's restrooms so that the centerline of the dispenser is between 7-9" from the front of the toilet.

**RESOLUTION** 

Completed on October 2, 2022

Completed on August 4, 2022

Completed on November 2, 2022

# **EQUAL OPPORTUNITY (EO)**

# FINDING #1:

# **Element 8: Complaint Processing Procedures**

The Pierre Office does not correctly process and log employment law related complaints. This is a repeat finding from the May 2021 review.

The Pierre office only logged one complaint in program year 2021 from the date of the review. During the staff interview, it was indicated the local office has had more than one wage and hour complaint. It was also indicated staff would benefit from training on the different types of complaints needing to be logged in the complaint log (e.g. employment law related and job service related) and the process for handling each type of complaint.

20 CFR 658 – Employment Service Complaint System, section 410 – Establishment of local and State complaint systems, (c) states in part the manager of Employment Service office must ensure a central complaint log is maintained, listing all complaints taken.

DLR Non-Discrimination Plan, Element 8, Exhibit A – DLR Discrimination Complaint Policy and Procedure stats in part, Job Service office employees' responsibilities for processing a complaint is to forward the complaint to the job service office manager or designee. It is the job service office manager (or designee) responsibility to refer complaints to the appropriate agency and document the complaint on the complaint log.

# **RESOLUTION**

**Required Action #1:** All employment related complaints and job service office complaints must be processed and logged by the local office manager or designee. The manager and/or designee must be trained on the complaint process including everyone's role with processing complaints, referring to the correct agency, and the requirement of logging complaints. All Pierre job service staff must be trained on their role to direct complaints to the manager or designee.

Completed on August 4, 2022

The Equal Opportunity Officer will develop a training for both the manager/designee and staff in the DLR Learning Management System. Once the training is complete, all staff in the Pierre Job Service Office must take it.

DLR RECOMMENDATION			
DLR recommends continuing with the American Job Center Affiliate Site Certification for this location.			
	<del></del>		
Kendra Ringstmeyer, DLR Director of Workforce Services	Date		
CERTIFICATION			
The Workforce Development Council (WDC) recognizes the criteria d	etailed in the Workforce Innovation and		
Opportunity Act (WIOA) One-Stop Career Center Certification (OSC) I			
have been successfully completed. Therefore, the Monitor is closed a	•		
Service is approved through June 30, 2026.			
Signed and approved by the undersigned on behalf of the Workforce	Development Council Members.		
Lee Anderson, Chairman, Workforce Development Council	Date		



# **PROGRAM REVIEW**

**FINDING #1:** In various files reviewed, including Wagner-Peyser, Youth, Adult, and JVSG files, the services and reporting elements did not match case notes. In the JVSG files, the VETS Objective Assessment and VETS Employment Goals were not entered, thus they were not reported. Service entry must align with case notes. This is identified in Review Indicator #2 in the <u>JVSG Participant File Review worksheet</u>. Case notes must align with, and support services provided. When not completed accurately, this can lead to data validation errors. In addition, not entering services appropriately can lead to reporting errors.

Completed on August 5, 2022

**RESOLUTION** 

**Required Action #1:** The DVOP and manager should familiarize themselves with the JVSG Participant File Review Worksheet and the JVSG services, starting with a V, identified in Resource 1 Services Chart. In your response to this letter, provide a summary of your review.

Review <u>Policy 5.3 Case Notes</u> as a team. Return a signed attendance sheet from this policy review. In addition, return the participant name, state ID, and case note date of one participant file from each Employment Specialists in your office. This case note will be reviewed to ensure compliance with Policy 5.3. In addition, it is recommended your team review the Case Note training that is now available in the Learning Management System.

**FINDING #2:** Policy 5.37 Youth Incentives states that all incentives must be written into the Employment Plan and signed. This is important as this provides financial authorization. The reviewer did not see this happening consistently. In addition, the reviewer noted Employment Plans were not maintained and updated throughout a participation period.

**Required Action #2:** Review Policy 4.11 Employment Plans, Policy 5.37 Youth Incentives, and the data entry guide for Youth Incentives as a team. Return a signed attendance sheet from this review.

Completed on August 5, 2022

**FINDING #3:** Policy 4.8 Basic Skills Deficient and Policy 4.9 Assessments were not being followed as files were missing assessments required to determine basic skills deficient and needs for additional services or the assessment was not within the allowable date range of six months prior to enrollment or 60 days after enrollment.

**Required Action #3:** Review Policy 4.8 Basic Skills Deficient and Policy 4.9 Assessments as a team. Return a signed attendance sheet from this policy review. Provide a statement of how the office will implement the required basic skills assessments testing. Review the Enrollment Guide, which offers guidance on how to identify basic skills determination after enrollment.

Completed on August 5, 2022

**FINDING #4:** It was noticed employment barriers were identified during the Objective Assessment with a veteran, yet the employment barrier was not addressed in the Employment Plan. The <u>JVSG Veterans</u> <u>Program Standard Operating Procedure</u> indicates this as a requirement to be in compliance with VETS.

**Required Action #4:** Review page 11 of the <u>JVSG Veterans Program Standard Operating</u> Procedure.

Completed on August 5, 2022

AMERICANS WITH DISABILITIES ACT (ADA)	
<b>FINDING #1:</b> Can the door be opened easily (5 pounds maximum force)? Currently the men's door requires 18lbs and the women's requires 20lbs.	RESOLUTION
ADA Required Action #1: Adjust door closers to require 5lbs of force or less to open.	Completed on October 31, 2022
<b>FINDING #2:</b> If the door has a closer, does it take at least 5 seconds to close from an open position of 90 degrees to a position of 12 degrees from the latch?	
ADA Required Action #2: Adjust door closers so to meet the required 5 seconds.	Completed on October 31, 2022
<b>FINDING #3:</b> If there is a coat hook, is it no less than 15" and no greater than 48" above the floor. Coat hooks are higher than 48".	
<b>ADA Required Action #3:</b> Lower coat hooks in women's restroom to no greater than 48". Currently, they are at 60".	Completed on October 31, 2022
<b>FINDING #4:</b> Are pipes below the lavatory insulated or otherwise configured to protect against contact? Pipes are currently exposed.	
ADA Required Action #4: Install insulation or foam padding over the drainpipe.	Completed on October 31, 2022
<b>DLR RECOMMENDATION</b> DLR recommends continuing with the American Job Center Affiliate Site Certification for this location.	
Kendra Ringstmeyer, DLR Director of Workforce Services  Date	
CERTIFICATION  The Workforce Development Council (WDC) recognizes the criteria detailed in the Workforce Innovation Opportunity Act (WIOA) One-Stop Career Center Certification (OSC) Policy 3.3, has been met. All finding have been successfully completed. Therefore, the Monitor is closed and certification for the Watertown is approved through June 30, 2026.  Signed and approved by the undersigned on behalf of the Workforce Development Council Members.	gs listed above
Lee Anderson, Chairman, Workforce Development Council  Date	