

**Finance and Compliance Committee Meeting**  
**Tuesday, February 16, 2021 at 9:00 AM**

**Zoom Meeting URL:**

<https://zoom.us/j/96118762134?pwd=bEVva2VtenhuOGtaM3FORkd2RjFQZz09>

- I. Call to Order**.....Andrew Warrington, Committee Chairman
- II. Public Comment**
- III. Chairman’s Report**.....Andrew Warrington
- Welcome to the Finance and Compliance Committee
  - Description and Duties of the Finance and Compliance Committee
- IV. Finance**
- Workforce Innovation and Opportunity Act Grant Overview Attachment A.1
    - PY20 LWIA 1 WIOA Grant Budget Attachment A.2
  - Lake County Workforce Development Grant Reports and Analysis Attachment B.1
    - December 2020 Grant Expenditure Report Attachment B.2
    - WIOA Grant Expenditure Report 2019 Attachment B.3
    - WIOA Grant Expenditure Report 2020
- V. Compliance**
- DCEO Workforce Development Monitoring Overview Attachment C.1
    - LWIA 1 PY19 Monitoring Announcement Letter Attachment C.2
    - LWIA 1 PY19 Monitoring Response Letter Attachment C.3
  - DCEO Equal Opportunity Monitoring Overview Attachment D.1
    - 2020 DCEO EO Compliance Response Letter Attachment D.2
    - 2020 DCEO EO Compliance Examination Summary of Findings Attachment D.3
- VI. Upcoming Board & Committee Meetings**
- Finance and Compliance Committee Meeting – TBD
  - Workforce Development Board Meeting – Thursday, February 25, 2021 at 8:00 AM
- VII. Adjournment**



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## Workforce Innovation and Opportunity Act Grant Overview

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### 1) Annual allocation

- a. Allocations are formula driven based on census, unemployment rates and industry growth/decline - [Training and Employment Guidance Letter No. 16-19.](#)
- b. Three grant funding streams are issued in one grant; funding streams are
  - i. Adult (1A)
  - ii. Dislocated Worker (1D)
  - iii. Youth (1Y)
- c. Grant life is two years
  - i. July – June program year
  - ii. 80% of the grant must be reported as expended or obligation in first twelve months
- d. Each of the three funding streams has a maximum of 10% that can be used for administrative purposes as defined by WIA
- e. Adult and dislocated worker funding streams have a minimum expenditure rate of 50% for direct participant training (Illinois Workforce Board policy)
- f. Youth funding stream has a minimum expenditure rate of 750% for Out of School Youth (Illinois has a waiver of 50% Out of School Youth expenditures)
- g. Youth funding stream has a minimum expenditure rate of 20% spent on work experience
- h. The Workforce Board sets policy for delivery of training services and spending caps per participant
- i. The Workforce Board procures youth programs and obligates a percentage of the youth program funding stream annually

## 2) WIOA Allocations Program Year 2020

Funding Stream	PY20 Allocation
Adult	\$1,981,804
Dislocate Worker	\$2,502,700
Youth	<u>\$2,096,374</u>
<u>TOTAL</u>	<u>\$6,580,878</u>

*Year One: July 2020 – June 2021 (80% expended/obligated)*

*Year Two: July 2021 – June 2022 (100% expended)*

Funding Stream	Admin – Maximum	Program
Adult	\$198,180	\$1,783,624
Dislocated Worker	\$250,270	\$2,252,430
Youth	\$209,637	\$1,886,737

Funding Stream	Program Allocation	50% Training Requirement	Balance to be budgeted for Workforce Development personnel, operations, Job Center
Adult	\$1,783,624	\$891,812	\$891,812
Dislocated Worker	\$2,252,430	\$1,126,215	\$1,126,215

Funding Stream	Program Allocation	20% Work Experience	75% Out of School
Youth	\$1,886,737	\$377,347	\$1,415,053

Funding Stream	Program Allocation	Contract Obligations ITA & WE Budget	Balance to be budgeted for Workforce Development personnel and operations plus youth ITAs and work experience
Youth	\$1,886,737	\$386,528 \$537,655	\$962,554

### 3) Two Basic Cost Categories

- a. Administration
  - i. Function based
  - ii. Not related to direct program services
  - iii. Can be both direct and indirect\*
- b. Program Activities
  - i. All grant costs that relate to direct provision of services to participants and employers

\* Differentiating between Direct and Indirect depends on how the cost is identified to a final cost objective (single versus multiple cost objectives) rather than the nature of the cost itself (unlike program or administrative). (2 CFR 200.413 and 200.414). Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. See also 2 CFR 200.405 -Allocable costs. The total cost of an award is the sum of the allowable direct and allocable indirect costs less any applicable credits.



**Direct costs** are those costs that can be identified specifically with a final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. (2 CFR 200.413)

**Indirect costs** are those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. (2 CFR 200.56)

#### 4) Administration Costs

- c. Definition
  - i. Applies to all grants and programs receiving WIOA Title I fund
  - ii. Referenced in the grant agreement
  - iii. Allocable portion of necessary and reasonable costs that are not related to direct provision of workforce services
- d. Administrative Functions
  - i. Accounting, budgeting, financial and cash management
  - ii. Procurement and purchasing
  - iii. Personnel and property management
  - iv. Payroll, audit and general legal services
  - v. Oversight and monitoring of administrative activities
  - vi. Developing information systems and procedures related to administrative functions

*Link to all WIOA definitions can be found [here](#).*




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## WORKFORCE INNOVATION AND OPPORTUNITY EXPENDITURE OVERVIEW

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### WIOA COMPLIANCE

1. Youth
  - a. 20% of budget should be spent on work experience
2. Adult and Dislocated Worker
  - a. 50% of the budget should be spent on training lines

### EXPENDITURES IN THE REPORTING LINES

1. Personnel and Fringe Benefits lines
  - a. Expenditures are for employee wages and fringe benefits
2. Other Administration lines
  - a. Expenditures that are related to operations
    - i. Rent, parking, utilities, printing, office supplies, and operational supplies
3. Indirect lines
  - a. Workforce pays Lake County an indirect rate based upon workforce employee wages. Currently the rate is 18.1%
4. Occupational Skills Training ITA line
  - a. Expenditures related to participant vocational training that leads to credential attainment in a high demand occupation
5. Supportive Services line
  - a. Expenditures related to participant transportation, childcare, assistance with educational training and testing, payments and fees for employment and training related expenses, certifications, and reasonable accommodations for individuals with disabilities
6. Work Experience/Internships line
  - a. Expenditures related to participant in a planned, structured training work experience
7. On the Job Training (OJT) line
  - a. Expenditures related to participants engaged with an employer providing a job that provides knowledge or skills essential to attaining full-time employment
8. Incumbent Worker Trainer (IWT) line
  - a. Expenditures related to an employer in a targeted sector to upgrade the skills of their workers
9. Transitional Jobs line
  - a. Expenditures related to participants engaged in a work experience who have barriers to employment due to chronic unemployment or inconsistent work history

**Lake County Workforce Development Board  
PY'20 WIOA Grant Budget**

Descriptions	WIB	Adminstration	Youth In School	Youth Out School	Adult	Dislocated	PY'20 Budget
Salaries & Fringes		486,116.00	76,391.00	586,994.00	686,413.00	672,426.00	<b>2,508,340.00</b>
Operational		11,500.00	4,167.00	39,653.00	48,329.00	32,298.00	<b>135,947.00</b>
Occupancy Expense		5,279.00	1,319.00	18,474.00	54,103.00	52,784.00	<b>131,959.00</b>
Indirect Cost Allocations		60,922.00	9,481.00	72,496.00	83,474.00	82,705.00	<b>309,078.00</b>
Temporary Employment Services				61,548.00	-	-	<b>61,548.00</b>
Trips & Training	5,000.00	1,502.00	333	2,519.00	2,733.00	2,713.00	<b>14,800.00</b>
Food and Provisions	1,200.00						<b>1,200.00</b>
WIB Regional Membership	14,000.00						<b>14,000.00</b>
IWP	1,500.00						<b>1,500.00</b>
NAWB	1,700.00						<b>1,700.00</b>
Consultants - LMI Data & Communication Outreach	75,000.00						<b>75,000.00</b>
United Way			133	1,450.00	1,917.00	1,500.00	<b>5,000.00</b>
EMSI			200	2,175.00	2,875.00	2,250.00	<b>7,500.00</b>
Subscriptions			51	551	728	570	<b>1,900.00</b>
Interview to Hire			307	3,335.00	4,408.00	3,450.00	<b>11,500.00</b>
Reduce Recidivism			-	83	83	84	<b>250</b>
Tab Tests			-	1,667.00	1,666.00	1,667.00	<b>5,000.00</b>
Business Outreach Services			1,633.00	21,467.00	53,567.00	46,333.00	<b>123,000.00</b>
Supportive Services				2,500.00	10,025.00	7,000.00	<b>19,525.00</b>
Youth Contracts				400,000.00			<b>400,000.00</b>
ITA's				134,890.00	535,978.00	630,513.00	<b>1,301,381.00</b>
Work Experience			15,000.00	399,750.00	225,000.00	220,000.00	<b>859,750.00</b>
OJT				26,000.00	70,000.00	95,000.00	<b>191,000.00</b>
Incumbent Worker				-		400,000.00	<b>400,000.00</b>
WFD Grand Total by Program	<b>98,400.00</b>	<b>565,319.00</b>	<b>109,015.00</b>	<b>1,775,552.00</b>	<b>1,781,299.00</b>	<b>2,251,293.00</b>	<b>6,580,878.00</b>

## Workforce Development Grant Expenditure Report (DEC 2020)

### Workforce Innovation and Opportunity Act Grant

Youth - Adult - Dislocated Worker	Cost Category	Allocation	Certified Costs	Obligations*	Percentage
PY'20 Grant (July 2020 - June 2022)	Administration	658,087	146,845		22.3%
	Youth	1,886,737	321,323	435,575.96	40.1%
	Adult	1,783,624	486,355	224,622.01	39.9%
	Dislocated Worker	2,252,430	923,222	268,860.51	52.9%
	Total	6,580,878	1,877,744	929,058	42.7%

WIOA Compliance		
	Goal	%
YOS	50%	17%
W/E	20%	3%
Training	50%	56%
Cost/Ob	85%	42.7%

### Workforce Innovation and Opportunity Act Grant

Youth - Adult - Dislocated Worker	Cost Category	Allocation	Certified Costs	Obligations*	Percentage
PY'19 Grant (July 2019 - June 2021)	Administration	457,698	457,698.00		100.0%
	Youth	1,277,905	793,531.34	4,672.14	62.5%
	Adult	1,232,040	1,232,040.00		100.0%
	Dislocated Worker	1,649,351	1,544,621.09	89,712.00	99.1%
	Total	4,616,994	4,027,890	94,384	89.3%

WIOA Compliance		
	Goal	%
YOS	50%	60%
W/E	20%	23%
Training	50%	56%
Cost/Ob	85%	89.3%

### Workforce Innovation and Opportunity Act Grant

Youth - Adult - Dislocated Worker	Cost Category	Allocation	Certified Costs	Obligations*	Percentage
PY'18 Grant (July 2018 - June 2020)	Administration	530,742	530,742.00		100.0%
	Youth	1,467,424	1,467,424.00		100.0%
	Adult	1,394,761	1,394,761.00		100.0%
	Dislocated Worker	1,914,515	1,914,515.00		100.0%
	Total	5,307,442	5,307,442	-	100.0%

WIOA Compliance		
	Goal	%
YOS	50%	92%
W/E	20%	20%
Training	50%	61%
Costs	85%	100.0%

### Opioid Grant

OPIOD'19 (October 2019 - June 2021)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	105,766.00	46,676.02	57,359.00	98.4%

### Rapid Response Trade Case Management (WIOA)

CM'19 (July 2019 - June 2021)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	45,239.00	44,829.00		99.1%

### Rapid Response Trade Case Management (WIOA)

CM'18 (October 2018 - June 2020)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	117,497.00	117,497.00		100.0%

### Trade Act Grant (TAA)

TAA'18 (October 2019 - September 2020)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	147,016.88	124,530.01		84.7%

### Dislocated Worker Training Grant

NEG'18 (January 2019 - December 2020)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	320,170.00	320,170.00		100.0%

### Disaster Relief Grant

(June 2020 - March 2022)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	1,223,650.00	185,198.25	698,178.10	72.2%

### Disaster Employment Grant

(June 2020 - March 2022)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	298,011.00	29,516.24	84,986.00	38.4%

### Layoff Aversion

(June 2020 - June 2021)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	123,942.26	113,513.91		91.6%

### Regional Grant

(June 2020 - March 2022)	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	166,005.00	52,162.50		31.4%



<b>Tollway ConstructionWorks Grant</b>					
<b>(September 2018 - August 2021)</b>					
	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	<u>63,739.00</u>	<u>33,110.88</u>		<u>51.9%</u>

<b>CLC ICCB Grant</b>					
<b>(September 2018 - August 2021)</b>					
	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	<u>32,564.00</u>	<u>7,993.69</u>		<u>24.5%</u>

<b>Incentive Funds (WIOA)</b>					
<b>PY'17 Incentive (July 2019 - June 2020)</b>					
	Cost Category	Budget	Certified Costs	Obligations*	Percentage
	Total Budget	<u>29,241.00</u>	<u>29,241.00</u>		<u>100.0%</u>

Certified costs for July 2020 reported on Aug 20, 2020. Obligations reported quarterly.

**WIOA PY'19 PROGRAM FUNDING**  
**WIOA Grant Term (7/1/2019 - 6/30/2021)**  
**Reporting Period (7/1/2019 - 12/31/2020)**

	<b>Budget</b>	<b>Actuals</b>	<b>Diff</b>	<b>% to Budget</b>
Administration - Personnel	248,928.00	297,268.22	(48,340.22)	119%
Administration - Fringe Benefits	123,667.00	101,075.15	22,591.85	82%
Administration - Other Administration	39,798.00	19,198.15	20,599.85	48%
Administration - Indirect	45,305.00	40,156.48	5,148.52	89%
<b>Total Administration</b>	<b>457,698.00</b>	<b>457,698.00</b>	<b>-</b>	<b>100%</b>
Youth In-School - Personnel	70,667.00	10,859.76	59,807.24	15%
Youth In-School - Fringe Benefits	35,339.00	4,815.85	30,523.15	14%
Youth In-School - Other Program Costs	15,881.00	2,800.65	13,080.35	18%
Youth In-School - Indirect	12,861.00	2,436.43	10,424.57	19%
<b>Youth In-School - Direct Training Cost</b>	<b>10,000.00</b>	<b>1,100.00</b>	<b>8,900.00</b>	<b>11%</b>
Remedial / Pre-Vocational Training	10,000.00	-	10,000.00	0%
Supportive Services	-	1,100.00	(1,100.00)	
<b>Youth In-School - Work Based Training</b>	<b>6,819.00</b>	<b>5,479.20</b>	<b>1,339.80</b>	<b>80%</b>
Work Experience / Internships	6,819.00	5,479.20	1,339.80	80%
<b>Total Youth In-School</b>	<b>151,567.00</b>	<b>27,491.89</b>	<b>124,075.11</b>	<b>18%</b>
Youth Out of School - Personnel	270,024.00	136,357.37	133,666.63	50%
Youth Out of School - Fringe Benefits	131,126.00	57,528.47	73,597.53	44%
Youth Out of School - Other Program Costs	57,491.00	50,950.38	6,540.62	89%
Youth Out of School - Indirect	49,144.00	23,219.87	25,924.13	47%
<b>Youth Out of School - Direct Training Cost</b>	<b>360,198.00</b>	<b>204,359.29</b>	<b>155,838.71</b>	<b>57%</b>
Occupational Skills Training ITAs	46,000.00	58,215.51	(12,215.51)	127%
Remedial / Pre-Vocational Training	313,998.00	143,619.69	170,378.31	46%
Supportive Services	200.00	2,524.09	(2,324.09)	1262%
<b>Youth Out of School - Work Based Training</b>	<b>258,355.00</b>	<b>293,624.07</b>	<b>(35,269.07)</b>	<b>114%</b>
Work Experience / Internships	258,355.00	279,621.57	(21,266.57)	108%
On-the-Job Training	-	14,002.50	(14,002.50)	100%
<b>Total Youth Out of School</b>	<b>1,126,338.00</b>	<b>766,039.45</b>	<b>360,298.55</b>	<b>68%</b>
Adult - Personnel	324,318.00	268,367.11	55,950.89	83%
Adult - Fringe Benefits	155,304.00	115,810.15	39,493.85	75%
Adult - Other Program Costs	183,741.00	145,409.75	38,331.25	79%
Adult - Indirect	59,026.00	56,196.51	2,829.49	95%
<b>Adult - Direct Training Cost</b>	<b>330,289.00</b>	<b>524,935.40</b>	<b>(194,646.40)</b>	<b>159%</b>
Occupational Skills Training ITAs	325,289.00	521,168.04	(195,879.04)	160%
Supportive Services	5,000.00	3,767.36	1,232.64	75%
<b>Adult - Work Based Training</b>	<b>179,362.00</b>	<b>121,321.08</b>	<b>58,040.92</b>	<b>68%</b>
On-the-Job Training	30,000.00	43,263.42	(13,263.42)	144%
Work Experience / Internships	122,362.00	78,057.66	44,304.34	64%
Transitional Jobs	27,000.00		27,000.00	0%
<b>Total Adult</b>	<b>1,232,040.00</b>	<b>1,232,040.00</b>	<b>-</b>	<b>100%</b>
Dislocated Worker - Personnel	318,181.00	277,407.14	40,773.86	87%
Dislocated Worker - Fringe Benefits	153,862.00	128,100.41	25,761.59	83%
Dislocated Worker - Other Program Costs	161,923.00	109,775.03	52,147.97	68%
Dislocated Worker - Indirect	57,909.00	49,207.35	8,701.65	85%
<b>Dislocated Worker - Direct Training Cost</b>	<b>470,157.00</b>	<b>863,403.63</b>	<b>(393,246.63)</b>	<b>184%</b>
Occupational Skills Training ITAs	469,157.00	860,220.90	(391,063.90)	
Supportive Services	1,000.00	3,182.73	(2,182.73)	318%
<b>Dislocated Worker - Work Based Training</b>	<b>487,319.00</b>	<b>116,727.53</b>	<b>370,591.47</b>	<b>24%</b>
On-the-Job Training	50,000.00	8,261.44	41,738.56	17%
Work Experience / Internships	137,319.00	83,315.09	54,003.91	61%
Incumbent Worker	300,000.00	25,151.00	274,849.00	8%
<b>Total Dislocated Worker</b>	<b>1,649,351.00</b>	<b>1,544,621.09</b>	<b>104,729.91</b>	<b>94%</b>
<b>Total WIOA PY'19 Grant</b>	<b>4,616,994.00</b>	<b>4,027,890.43</b>	<b>589,103.57</b>	<b>87%</b>

## WIOA COMPLIANCE PY'19

Youth Tot Budget		Expense	Work Experience	% Work Exp
Y-IN	151,567.00	27,491.89	5,479.20	
Y-OUT	1,126,338.00	766,039.45	293,624.07	
	<b>1,277,905.00</b>	<b>793,531.34</b>	<b>299,103.27</b>	<b>23.41%</b>
Adult/Disl Budget		% of Budget	Training Expense	% of Training
Adult	1,232,040.00	43%	646,256.48	
Dislocated	1,649,351.00	57%	980,131.16	
	<b>2,881,391.00</b>		<b>1,626,387.64</b>	<b>56.44%</b>

**WIOA PY'20 PROGRAM FUNDING**  
**WIOA Grant Term (7/1/2020 - 6/30/2022)**  
**Reporting Period (7/1/2020 - 12/31/2020)**

	<b>Budget</b>	<b>Actuals</b>	<b>Diff</b>	<b>% to Budget</b>	<b>% of 80%</b>
Administration - Personnel	342,259.00	90,850.17	251,408.83	27%	33%
Administration - Fringe Benefits	143,857.00	34,238.54	109,618.46	24%	30%
Administration - Other Administration	111,049.00	2,218.75	108,830.25	2%	2%
Administration - Indirect	60,922.00	19,537.06	41,384.94	32%	40%
<b>Total Administration</b>	<b>658,087.00</b>	<b>146,844.52</b>	<b>511,242.48</b>	<b>22%</b>	<b>28%</b>
Youth In-School - Personnel	53,265.00	4,529.07	48,735.93	9%	11%
Youth In-School - Fringe Benefits	24,212.00	2,032.75	22,179.25	8%	10%
Youth In-School - Other Program Costs	10,129.00	30.56	10,098.44	0%	0%
Youth In-School - Indirect	9,481.00	859.49	8,621.51	9%	11%
<b>Youth In-School - Direct Training Cost</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>0%</b>
Remedial / Pre-Vocational Training	-	-	-	0%	0%
<b>Youth In-School - Work Based Training</b>	<b>15,000.00</b>		<b>15,000.00</b>	<b>0%</b>	<b>0%</b>
Work Experience / Internships	15,000.00	-	15,000.00	0%	0%
On-the-Job Training	-	-	-		
<b>Total Youth In-School</b>	<b>112,087.00</b>	<b>7,451.87</b>	<b>104,635.13</b>	<b>7%</b>	<b>8%</b>
Youth Out of School - Personnel	407,283.00	87,523.56	319,759.44	21%	27%
Youth Out of School - Fringe Benefits	189,384.00	35,014.16	154,369.84	18%	23%
Youth Out of School - Other Program Costs	115,874.00	6,932.63	108,941.37	6%	7%
Youth Out of School - Indirect	72,496.00	16,247.66	56,248.34	22%	28%
<b>Youth Out of School - Direct Training Cost</b>	<b>393,712.00</b>	<b>95,620.15</b>	<b>298,091.85</b>	<b>24%</b>	<b>30%</b>
Occupational Skills Training ITAs	124,046.00	48,286.44	75,759.56	39%	49%
Remedial / Pre-Vocational Training	267,166.00	46,232.92	220,933.08	17%	22%
Supportive Services	2,500.00	1,100.79	1,399.21	44%	55%
<b>Youth Out of School - Work Based Training</b>	<b>595,901.00</b>	<b>72,533.38</b>	<b>523,367.62</b>	<b>12%</b>	<b>15%</b>
Work Experience / Internships	569,901.00	66,881.94	503,019.06	12%	15%
On-the-Job Training	26,000.00	5,651.44	20,348.56	22%	27%
<b>Total Youth Out of School</b>	<b>1,774,650.00</b>	<b>313,871.54</b>	<b>1,460,778.46</b>	<b>18%</b>	<b>22%</b>
Adult - Personnel	468,957.00	97,691.17	371,265.83	21%	26%
Adult - Fringe Benefits	240,436.00	40,350.32	200,085.68	17%	21%
Adult - Other Program Costs	239,333.00	32,218.52	207,114.48	13%	17%
Adult - Indirect	83,474.00	11,315.32	72,158.68	14%	17%
<b>Adult - Direct Training Cost</b>	<b>456,424.00</b>	<b>258,750.97</b>	<b>197,673.03</b>	<b>57%</b>	<b>71%</b>
Occupational Skills Training ITAs	446,399.00	257,533.53	188,865.47	58%	72%
Supportive Services	10,025.00	1,217.44	8,807.56	12%	15%
<b>Adult - Work Based Training</b>	<b>295,000.00</b>	<b>46,028.32</b>	<b>248,971.68</b>	<b>16%</b>	<b>20%</b>
On-the-Job Training	70,000.00	11,708.99	58,291.01	17%	21%
Work Experience / Internships	198,000.00	34,319.33	163,680.67	17%	22%
Transitional Jobs	27,000.00		27,000.00	0%	0%
<b>Total Adult</b>	<b>1,783,624.00</b>	<b>486,354.62</b>	<b>1,297,269.38</b>	<b>27%</b>	<b>34%</b>
Dislocated Worker - Personnel	421,003.00	123,074.28	297,928.72	29%	37%
Dislocated Worker - Fringe Benefits	218,925.00	50,837.09	168,087.91	23%	29%
Dislocated Worker - Other Program Costs	209,760.00	32,904.12	176,855.88	16%	20%
Dislocated Worker - Indirect	74,939.00	22,270.21	52,668.79	30%	37%
<b>Dislocated Worker - Direct Training Cost</b>	<b>612,803.00</b>	<b>560,083.66</b>	<b>52,719.34</b>	<b>91%</b>	<b>114%</b>
Occupational Skills Training ITAs	605,803.00	559,420.65	46,382.35	92%	115%
Supportive Services	7,000.00	663.01	6,336.99	9%	12%
<b>Dislocated Worker - Work Based Training</b>	<b>715,000.00</b>	<b>134,052.52</b>	<b>580,947.48</b>	<b>19%</b>	<b>23%</b>
On-the-Job Training	95,000.00	26,431.67	68,568.33	28%	35%
Work Experience / Internships	220,000.00	107,620.85	112,379.15	49%	61%
Incumbent Worker	400,000.00	-	400,000.00	0%	0%
<b>Total Dislocated Worker</b>	<b>2,252,430.00</b>	<b>923,221.88</b>	<b>1,329,208.12</b>	<b>41%</b>	<b>51%</b>
<b>Total WIOA PY'20 Grant</b>	<b>6,580,878.00</b>	<b>1,877,744.43</b>	<b>4,703,133.57</b>	<b>29%</b>	<b>36%</b>

## WIOA COMPLIANCE PY'20

Youth	Budget	Expense	Work Experience	% Work Exp
Y-IN	112,087.00	7,451.87	0.00	
Y-OUT	1,774,650.00	313,871.54	72,533.38	
	<b>1,886,737.00</b>	<b>321,323.41</b>	<b>72,533.38</b>	<b>3.84%</b>
Adult/Disl	Budget	% of Budget	Training Expense	% of Training
Adult	1,783,624.00	44%	304,779.29	
Dislocated	2,252,430.00	56%	694,136.18	
	<b>4,036,054.00</b>		<b>998,915.47</b>	<b>24.75%</b>




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## Workforce Innovation and Opportunity Act Grant Monitoring Overview

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### Background

The Department of Commerce and Economic Opportunity (DCEO) conducts annual joint monitoring of grant administration, programmatic activities, participant file reviews and the financial records pursuant to the Grant Agreement entered into between DCEO and Lake County. Lake County Workforce Development Department is monitored for compliance with all applicable federal and State laws, regulations, and rules, WIOA regulations and Grantor policies applicable to the grant agreement. Workforce Development's performance will be assessed to gauge its impact upon the target population and for the effective and efficient utilization of the WIOA funds. Assessments will occur both during the operation of the program and upon its completion.

### Continuous Monitoring Activities

Monitoring has a wide variety of meanings and all of them relate to providing oversight and guidance of the grants and grant-funded programs/activities. DCEO undertakes these levels of ongoing monitoring and Workforce Development has monitoring processes in place as well.

- **Review and evaluation of grant applications:** monitors/reviews grant applications for quality, content, and adherence to eligibility requirements.
- **Review of performance measures:** monitors/collects information on progress toward completion of the project's objectives using performance data collected in the participant performance management system – Illinois Workforce Development System (IWDS) and the Grant Reporting System (GRS).
- **Approval of grant-required reports:** monitors/tracks reports submitted. They notify us of report due dates and will examine the submitted reports for timelines, content, accuracy and supporting documentation.
- **Ongoing Communication:** monitors provide guidance to grantees by providing contact information for agency grant managers, Office of Accountability staff, and other agency staff to facilitate improved communication and cooperation between the Department of Commerce and grantees, and to provide better technical assistance to grantees.
- **Conduction of desk reviews:** conducts this type of review to further monitor/evaluate the information required.
- **Conduction of on-site reviews:** monitor/observe how grant records are maintained related to grant expenditures and required activities or to provide technical assistance as needed.
- **Conduction of on-site visits:** occasional site visit to monitor/observe a grantee's facility, meet with the grantee, view the physical plant and operations, or discuss the project progress.
- **Review of independent audits:** Independent audit is required to be submitted in order to monitor/assess your fiscal and programmatic compliance to applicable laws and regulations.

### Oversight

The information falls into one of three categories: financial data, such as expenses paid for with federal funds; compliance information to ensure the recipient is following federal regulations; and project data highlighting progress and/or community impact.

The required information may be collected through several different channels, including regular progress reports, site visits, and audits (see table below).

Progress Reports	Site Visits & Technical Assistance	Audits
<p>Grant recipients submit regular reports (called "Periodic Performance Report" or "PPR" and "Periodic Financial Report" or "PFR") documenting a project throughout its lifespan.</p> <p>These reports may include both expense-related data and quantitative information about the project's progress and impact.</p>	<p>Grant recipients may receive site visits from DCEO. Such visits provide an opportunity for two-way communication between the grantor and the award recipient.</p> <p>Technical assistance provided by the grantor is also a means for ensuring that the grant recipient is complying with the award agreement.</p>	<p>The Single Audit Act (amended in 1996) states that grant recipients may be subject to an audit once a year.</p> <p>The audit aims to ensure compliance with government regulations and evaluate financial information, including expenses paid for with federal award funds.</p>

### Quarterly Reports

Grantees are required to submit reports to DCEO as outlined in the Deliverable Schedule of the Grant Agreement. This includes the progress reports listed above. Grantees submittal of the required reports allows the Department to monitor the grantees' progress toward grant defined goals and their due diligence in grant fiscal management and recordkeeping.

If a grantee has not submitted a report by the due date and has not provided proper justification, the noncompliance process will start. The noncompliance process will also start if there are any issues with the report and the grantee is not working to resolve. Additional information on the noncompliance process is located at: Grant Noncompliance Process.

### Internal Audit Processes

- **Program:** Workforce Development conducts an internal workforce development audit on WIOA and Trade program files yearly before the formal audit to identify and review any possible audit findings before DCEO monitoring review. This internal audit is led by the Information Compliance Specialist at the direction of Jennifer Serino on an annual basis.
- **Finance:** The Workforce Development Business office leads the internal audit efforts with an ongoing check and balance process. The team has created a method of reviewing the vouchers and verifying them through two levels of management, the accountant and then verified by the Business Manager, before processing for payment.



**Illinois**  
**Department of Commerce**  
& Economic Opportunity  
**OFFICE OF EMPLOYMENT & TRAINING**  
JB Pritzker, Governor

May 7, 2020

Ms. Jennifer Serino  
Director  
Lake County Workforce Development Department  
1 North Genesee Street, Floor 1  
Waukegan, IL 60085-8103

Re: Grant Nos.: 17-632001, 17-651001, 17-661001, 17-681001, 18-651001,  
18-671001, 18-681001, 19-651001, 19-671001, 19-681001

Dear Ms. Serino:

As part of our routine financial/programmatic monitoring operation, the Office of Employment and Training has scheduled your agency for a combined fiscal and programmatic review of the above-referenced grants. The monitoring will cover the time period April 1, 2019 through March 31, 2020. Per our communication, the review is scheduled to begin on May 21, 2020, at 9:30am. Tony Lesniak, George Nelson, Tom Mraz, Simona Velazquez, and Carmind Burns are assigned to conduct the review.

Due to the COVID-19 national health emergency, DCEO may modify some of the monitoring procedures to comply with the Governor's Executive Orders and the directive of public health officials. It is recognized that the typical timelines for the monitoring may be extended based on the Department's ability to review documents and complete the monitoring instrument. The DCEO lead will work with your staff to coordinate the logistics of the monitoring components that can be completed remotely. It is anticipated that there may be additional onsite components that will need to be completed at a later date.

The purpose of the monitoring is to assure compliance with the Workforce Innovation and Opportunity Act; the Trade Act and its amendments, if applicable; and to find any errors or weaknesses which could potentially lead to audit findings. Further, if any weaknesses are found, we will make recommendations to correct these findings prior to an official audit. This review does not replace a certified audit.

For your information, a copy of the questions contained in the monitoring instrument to be used during the review is enclosed.

This letter is to also document the items that will be needed in order for us to conduct the fiscal and programmatic monitoring of your agency. The request for documents attached to this letter lists the documents required for both fiscal and programmatic reviews. The documents are to be sent to monitoring staff prior to the start of the review unless it is indicated that the documents must be made



available at the on-site review. This will enable us to select sampling from the indicated areas prior to the site visit and help create a more efficient monitoring process. This list is not all inclusive; we may request additional materials throughout the monitoring process. Failure to provide these materials by the requested dates may result in postponement of the review as well as a finding.

You will be provided with the selected participant file sample list prior to the entrance conference. In addition, you will be provided a Checklist Guide for Remote Monitoring for all programs included in the monitoring review. The required documents for each selected participant file should be uploaded into IWDS within the Application Menu heading "List all Documents" on or before Monday, May 21, 2020.

We will begin monitoring directly after the entrance conference on May 21, 2020. It would expedite the review if you would assign one of your staff as a main contact person to be available should questions arise during the remote monitoring process.

Thank you for your attention to these items. If you have any questions concerning the review or problems in scheduling, do not hesitate to contact Tony Lesniak at 312-270-3328 or via email at [Anthony.Lesniak@illinois.gov](mailto:Anthony.Lesniak@illinois.gov).

Sincerely,



John Barr  
Office of Employment and Training

Attachments

cc: Sandy Hart  
Andrew Warrington  
Demar Harris  
Angela Cooper  
Tony Lesniak  
George Nelson  
Tom Mraz  
Simona Velazquez  
Carmind Burns

# REQUEST FOR DOCUMENTS - FISCAL

## **Fiscal Monitoring Documents**

Please send the items listed below in electronic format to [anthony.lesniak@illinois.gov](mailto:anthony.lesniak@illinois.gov) and [ronald.johnson@illinois.gov](mailto:ronald.johnson@illinois.gov) by May 14, 2020. The Illinois.Gov File Transfer website (<https://filet.illinois.gov/filet/pimupload.asp>) may be used for electronic transfer of files. **Failure to provide these materials by the date indicated will be cause for issuance of a finding and may result in rescheduling the event.**

### **General Information**

- Chart of Accounts used during the review period
- Board approved budget
- Detailed General Ledger for the review period
- Most Recently filed Form 990 (non-profit tax return), if applicable

### **Reporting Requirements/Obligations**

- Detailed information supporting the obligations reported in GRS for the quarters ending September 30, 2019 and March 30, 2020
- Reconciliations of Budgeted to Actual MOU Costs for the two most recent reconciliation periods
- Most recent Applications for Certification of One-Stop Centers for all Comprehensive One-Stop Centers

### **Internal Controls**

- Policies and Procedures for the following:
  - Bank Reconciliation
  - Cash Depositing
  - Cash Disbursements
  - Cash Management, Drawdowns or Reimbursements
  - Cost Allocation
  - Cost Classification
  - Fiscal Compliance Rules and Regulations
  - Individual Training Accounts (ITAs)
  - Needs Related Payments
  - Participant Incentive Payments and Stipend Payments
  - Participant Payroll
  - Petty Cash
  - Property Records and Management
  - Protected Personally Identifiable Information
  - Purchasing
  - Reconciliations Between Subsidiary and Official Records
  - Recording of Accounting Transactions
  - Reporting
  - Staff Payroll
  - Staff Incentives/Bonuses
  - Staff Travel

- Subrecipient Monitoring
- Supportive Services
- Trade Act
- Copies of RFPs, evaluations, and other procurement related documents for subrecipient contracts awarded.
- Completed Segregation of Duties Worksheet
- Inventory Listing
- Documentation of last inventory conducted
- Most recent One-Stop Operator Procurement Attestation Form(s)

### **Bank Reconciliation**

- List of all bank accounts for the organization.
- List of any changes to authorized signers
- Bank Reconciliations to the General Ledger Cash for all accounts at month end for the following month(s): January 2020, February 2020, and March 2020.
- Trial Balance showing the Total WIOA/Trade cash balances at month end for the following month(s): January 2020, February 2020, and March 2020.
- Documentation of daily cash receipts and daily disbursements for the following month(s): January 2020, February 2020, and March 2020.
- Cash Disbursements Register for the review period in Excel format. This document should contain information on the specific account codes from which the disbursement was paid. This document will be utilized to sample cash disbursements.

**NOTE: The selected disbursements sample (including copies of the front and back of cancelled checks) will need to be made available immediately after the entrance conference.**

### **Cost Allocation**

- Copy of current cost allocation plan
- Copy of current Negotiated Indirect Cost Rate Agreement, if applicable
- Copy of cost allocations at month end for the following months: September 2019 and March 2020.

### **Payroll**

- List of employees throughout the review period (this list will be used to select the employees for the Payroll/Personnel Analysis)
- Personnel Policies and Procedures
- Time allocation study, if applicable

**The following Payroll related items must be available when the monitors arrive for on-site review**

- Time and attendance records for selected sample
- Payroll registers for selected sample
- Payroll tax payment documentation (such as Form 941 and related payment receipt) for sample selected
- Wage authorization documentation for selected sample
- Job descriptions for staff selected in sample

- W-4s for selected sample

**Fringe Benefits**

- Accrued Leave (Cash) Account Reconciliation, (if applicable), for the quarters ending December 2019 and March 2020.
- Support for Accrued Leave Funds, if applicable

**Generally Accepted Accounting Principles**

- Completed Insurance Analysis Form

**Audit Resolution**

- Copy of most current Single Audit
- Status/Resolutions of prior year audit findings
- Status/Resolutions of prior year monitoring findings and management recommendations

**Subrecipient Monitoring**

- Listing of subrecipient contracts including contract number, contract amount, and period of contract, and the dates they were monitored by your staff.
- Subrecipient fiscal monitoring files for selected sample (**must be made available when monitors arrive for on-site review**)

**Petty Cash**

- Petty Cash policies and procedures
- Reconciliation of petty cash for the monitoring period.

# REQUEST FOR DOCUMENTS - PROGRAMMATIC

## **Programmatic Monitoring Documents**

Please send the items listed below in electronic format to [ronald.johnson@illinois.gov](mailto:ronald.johnson@illinois.gov) and [simona.velazquez@illinois.gov](mailto:simona.velazquez@illinois.gov) by May 14, 2020. The Illinois.Gov File Transfer website (<https://filet.illinois.gov/filet/pimupload.asp>) may be used for electronic transfer of files. **Failure to provide these materials by the date indicated will be cause for issuance of a finding.**

### **Contract Review**

- List of contracts (list should include period of service, amount, and contract number) for:
  - Service Providers
  - Training Services
  - Youth Services
  - OJT
  - Customized Training

### **Other (Work Experience, OJT, Incumbent Worker)**

- List of Work Experience Work Sites (with participant names indicated for each site), Training Service Contracts, OJT Contracts, and Incumbent Worker Agreements to be used to select a sample for review (list should include contract number, amount, and period of service)
- **The following documents related to Work Experience, OJT, and Incumbent Worker must be made available when the monitor arrives for on-site review:**
  - Work Experience Worksite Agreements selected for review
  - Copies of OJT Contracts selected for review
  - Copies of OJT Pre-award surveys selected for review
  - Copies of Monitoring Documents for Work Experience Worksites and OJT Contracts Selected for Review
  - Copies of Skills Gap Assessments and Training Outlines for OJT Contracts Selected for Review
  - Copies of Employment Reimbursements for OJT Contracts Selected for Review
  - Copies of Incumbent Worker Training Agreements selected for review
  - Copies of Employer Reimbursements (and Support for Employer's Matching Contribution) for IWT Contracts Selected for Review
  - Copies of Training Service Contracts selected for review

### **Policies and Procedures**

- Policies for the following:
  - Individual Training Accounts (ITA)
  - Supportive Services
  - Procurement
  - Work Experience
  - OJT
  - Customized Training

- Incumbent Worker
- Self-Sufficiency
- Income Eligibility Guidelines
- Follow-up Policy
- Adult Priority of Service

Workforce Development Department  
1 North Genesee Street  
Waukegan, Illinois 60085  
847-377-3450

August 20, 2020

John Barr  
Office of Employment and Training  
Illinois Department of Commerce and Economic Opportunity  
[John.W.Barr@illinois.gov](mailto:John.W.Barr@illinois.gov)

Dear Mr. Barr:

This letter summarizes the responses and corrective actions taken to date by the Lake County Workforce Development Department in response to the DCEO letter dated July 27, 2020 summarizing the findings and management recommendations of the combined fiscal and programmatic monitoring. DCEO conducted remote monitoring during the period of May 21, 2019 through May 29, 2020 to monitor compliance with the Workforce Innovation and Opportunity Act, the Trade Act and its amendments, and other applicable rules, regulations and policies. The period reviewed during this monitoring was April 1, 2019 through March 31, 2020.

**Fiscal Monitoring Results:**

There were no materials fiscal findings.

**Programmatic Monitoring Results:**

**Finding #1**

Data Validation: All of the assessment test dates and/or scores recorded in IWDS are not consistent with all of the hard copy assessments tests in the participant file.

Jones, Ramone S XXX-XX-8220 - Test dates are different - IWDS 9/21/19 and hard copy of the TABE mathematics test is on 9/11/19

**Corrective Action #1**

The LWIA must ensure that the test dates and test scores recorded in IWDS match the hard copy of all of the tests in the participant file.

**Lake County Workforce Development Response #1**

Lake County Workforce Development corrected the test dates and test scores in IWDS to match the hard copy of the test.

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**Finding #2**

Trade Program Administration: The dates on the TAA Additional Info Screen do not match the dates on the TAA Benefits, Rights and Obligations (Form #001) and the Trade Adjustment Assistance Standard Application (Form #002).

Rokusek, Daniel S XXX-XX-7788 - Impact dates do not match - TAA additional info screen in IWDS is showing 3/16/17 and IDES TRA is showing 3/15/18

Zhang, Suzie XXX-XX-2788 - Impact dates do not match - IWDS is showing 3/16/17 and IDES TRA is showing 3/15/18

**Corrective Action #2**

For each identified customer, the LWIA must ensure that the dates on the TAA Additional Info Screen match the dates on the Trade Adjustment Assistance Standard Application and the TAA Benefits, Right and Obligations Form. Although the impact date is off by only one day, it is important that it is corrected because the impact date is one of the critical dates in determining the eligibility of the Trade customers. If a case manager is not able to correct the date in the system, the LWIA is advised to work with the DCEO Trade Program staff to make the correction in the system.

**Lake County Workforce Development Response #2**

Lake County Workforce Development worked with DCEO Trade program staff to make the correction in IWDS. The impact date in IWDS matches IDES TRA date of March 15, 2018.

**Finding #3**

Non-Compliant Local Workforce Innovation Board Membership: Based on the information available at the time of this review, the Local Workforce Innovation Board does not include all of the WIOA-required members. The WIOA requires the board to include two (2) or more representatives of labor organizations where such organizations exist in the local area and, whom have been nominated by local labor federations. Where labor organizations do not exist in the local area, representatives must be selected from other employee representatives. (20 CFR 679.320(c)(1))

**Corrective Action #3**

The Chief Elected Official (CEO) for LWIA 1 must appoint at least one additional labor representative to the Local Workforce Innovation Board as outlined in the WIOA regulations. The LWIA must continue to work with the Department and provide the completed local workforce board composition documents as evidence that the board appointment has been made.

**Lake County Workforce Development Response #3**

Lake County Workforce Development is working with the Chief Elected Official (CEO) to identify an additional labor representative to be appointed to the Workforce Board of Lake County and requesting 6 months to complete this process and have an additional labor representative appointed to the Lake County Workforce Development Board and the local board composition documents submitted to DCEO.

If you should have any additional questions, please contact Jennifer Serino at 847-377-2224 or Angela Cooper at 847-377-3420.

Sincerely,



Jennifer Serino

cc: Sandy Hart  
Andrew Warrington  
Demar Harris  
Angela Cooper  
Tony Lesniak



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## DEPARTMENT OF COMMERCE AND ECONOMIC OPPORTUNITY

### Equal Opportunity Monitoring Overview

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#### Background

The Department of Commerce and Economic Opportunity (DCEO) and the Illinois Department of Employment Security (IDES) serve as Illinois' designated administrative entities in administering the Workforce Innovation and Opportunity Act (WIOA) throughout the State. As instructed in the nondiscrimination and equal opportunity provisions contained in 29 CFR 38.28-33. The Nondiscrimination Plan serves as assurance for the United States Department of Labor (USDOL), Civil Rights Center (CRC), that the State of Illinois has appropriate and meaningful measures in place to comply with the requirements set forth in the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act, as detailed in 29 Code of Federal Regulations (CFR) Part 38. Illinois and all our statewide partners are committed to ensuring equal opportunity and meaningful and universal access to programs, services and benefits administered through DCEO and IDES and our Illinois workNet Center system.

The [Nondiscrimination Plan](#) will act as policy for the Illinois workNet system in the administration of the Equality Opportunity Provisions and be incorporated into the Illinois workNet ePolicy portal.

#### Data Categories

Monitoring activities are critical to identifying discriminatory practices and largely depend on the existence of verifiable applicant and participant data. Data is collected and maintained by race, ethnicity, sex, age, and disability status. All applicant characteristics are collected at point of intake and/or service. Race/ethnicity categories are stipulated through Federal requirements and our data collection efforts reflect the following classifications:

- White; Black or African American;
- Hispanic or Latino;
- Native American; and,
- Asian/Pacific Islander

The information is used only for record keeping, reporting, determining applicant eligibility, and determining program compliance with nondiscrimination requirements for specified, targeted groups. The collection of data reflects the composition of the LWIA workforce at each geographical location, by race, national origin, sex and disability, and any other category that DCEO may require.

#### Illinois Workforce Development System (IWDS)

The Illinois Workforce Development System (IWDS) records and stores WIOA programmatic and demographic data in accordance with guidance from the Office of Employment and Training. IWDS is compliant with 29 CFR 38.42 in the collection of the required EO statistical data at the point in which the job seeker/client is "registered" or the person hired becomes an employee of the agency or its partnerships. Recipients are required to maintain statistical analysis records in accordance with 29 CFR 38.43. Procedures have been enacted for investigating and accessing any significant statistical disparity.

The annual EO monitoring conducted by the State-Level EO Officer includes a data review and analysis. To ensure that EOMC and its partners are administering its programs and activities in a nondiscriminatory manner, a review of data collected and maintained within IWDS is performed. This review provides a statistical analysis of the data collected and includes an analysis by race/ethnicity, sex, age, disability status, Limited English Proficiency and preferred language by LWIA. This analysis employs dynamic formulas to compare each group's success rates versus all others to identify any outliers. If an anomaly is found performing the dynamic formula analysis, further analysis is completed using the standard

deviation method. This data analysis process will be initially completed for the program year end June 30, 2019. As EOMC continues to improve our data collection and analysis process, statistical analysis will also be utilized to perform trend analysis to identify potential areas of improvement or opportunities to enhance our outreach efforts.

A fundamental goal of IWDS is to provide case managers with tool for managing their customers' programs, by collecting data about the participant's acceptance rates by race/ethnicity, sex, age, and disability status for those who apply for and receive services funded by WIOA programs. This includes evaluating client eligibility, recording assessment results, developing and implementing service plans, inserting case notes and exit outcomes.

WIOA programs that are monitored include:

- Adult;
- Dislocated worker;
- Youth programs;
- Trade Adjustment Act (TAA);
- Disability Employment Initiative (DEI);
- Rapid Response;
- Workforce Development (WDQI);
- WIF Partners & Regional; and,
- National Dislocated Worker Grants (NDWG)

### On-Site Reviews

On-Site Reviews provide the opportunity to meet and discuss policies, procedures, or issues with top LWIA management and the EO Officer. It may be used to clarify information from the desk review. The primary contact during this phase of the review is the LWIA EO Officer.



## Illinois Department of Commerce & Economic Opportunity

JB Pritzker, Governor

August 28, 2020

Ms. Jennifer Serino  
Director  
Lake County Workforce Development Department  
1 North Genesee Street Floor 1  
Waukegan, IL 60085-8103

Dear Ms. Serino:

The Office of Equal Opportunity Monitoring and Compliance (EOMC) completed a review based on the Equal Opportunity (EO) Self-Assessment Survey for your local workforce investment area. In lieu of the annual comprehensive on-site review due to the Covid-19 pandemic, your responses to the self-assessment helps to provide assurances to Department of Commerce and Economic Opportunity (DCEO) and the United States Department of Labor (USDOL) that accessibility, both programmatic and physical, comply with State and Federal laws and regulations.

Senior State Equal Opportunity Officer and Investigator, Tim Golemo, completed a thorough review of the answers provided by your staff and have identified ranges of compliance. There is one finding that is noted in the accompanying report with regards to Section 188 of the Workforce Investment Act (WIOA), specifically, Code of Federal Regulations 29-37 /38.

I would like to thank you and your staff for your cooperation during this phase of the self-assessment monitoring process. The next phase of the monitoring process will be based on the quantitative significance of your demographic statistics, which occur later this fall, after the Illinois Workforce Development System (IWDS) populates the end of the fiscal year data.

If you have any questions, please contact, Mr. Golemo directly at (217) 299-8515.

All the best,

A handwritten signature in blue ink that reads "Jared Walkowitz".

Jared Walkowitz  
Deputy Director

cc: Sandy Hart, CEO  
Andrew Warrington, LWIB Chair  
Laura Gergely  
Demar Harris  
Robert Trapp

**DEPARTMENT OF COMMERCE AND ECONOMIC OPPORTUNITY  
EQUAL OPPORTUNITY COMPLIANCE EXAMINATION**

**Summary of Findings for the Lake County Workforce Development Department**

**Release Date:** August 28, 2020

**Total findings this review:** 1

**Total last audit:** 7

**Repeated from last audit:** 0

**Jurisdiction and Scope of Review:**

Tim Golemo conducted self-assessment monitoring reviews for the Federal Workforce Innovation and Opportunity Act (WIOA) funds granted through the Lake County Workforce Development Department (LCWDD). The compliance review was conducted pursuant to 29 CFR 38 – Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act and the EO Policy Letter No. 00-07.

**Locations included in Self-Assessment:**

The following list includes the Illinois workNet and affiliated satellite offices that were included in the monitoring review.

1. Job Center of Lake County- 1 North Genesee Street, Floor 1, Waukegan, IL 60085
2. Grayslake Job Center- 800 Lancer Lane, Grayslake, IL 60030

LWIA Contract Service Providers included in self-assessment review:

1. Kotra Truck Driving School - 35 Old Skokie Road, Park City, IL 60085
2. Comnet Group Inc. - 150 South Saunders Road, Suite 150, Lake Forest, IL 60045
3. College of Lake County- 19351 W. Washington Street, Grayslake, IL 60030
4. SHINE Pharmacy Technician Program- 1201 N. Sheridan Rd., Waukegan IL, 60085
5. Youth conservation Corps. – 1020 W. Greenwood Ave., Waukegan, IL 60087
6. Northpointe Resources – 3441 Sheridan Rd., Zion, IL 60099
7. State Career College – 2770 Grand Avenue, Waukegan, IL 60085
8. YouthBuild Lake County – 2303 Kemble Ave., North Chicago, IL 60064

**Compliance Examination Time Period:**

The monitoring review provides assurance that LCWDD's EO policies, operational programs, and administrative procedures, records, and reports complied with the State and Federal regulations during the period since the last review was conducted (June 2017 – present).

### **WIOA Programs Administered:**

The following programs using Federal WIOA funds as granted by DCEO: Adult (1A) Training, Dislocated Worker Program (DWP), Youth (1Y), WIOA Rapid Response, COVID Grants, Trade Adjustment Assistance (TAA), National Dislocated Worker, Innovation Grants, Dislocated Worker Disaster, Dislocated Worker Employment Recovery, and Opioid Crisis grants.

### **Synopsis of Findings:**

Based on the evaluation conducted, the Office of Equal Opportunity Monitoring and Compliance (EOMC) offer the following synopsis of findings identified during the annual EO compliance monitoring:

**Designation of Equal Opportunity Office (29 CFR 38.28 – 38.33):** Compliant – LCWDD designated Demar Harris as the EO Officer for their local workforce area. Mr. Harris reports to the Executive Director. He has attended EO related training including those held by the DCEO.

**Notice and Communication (29 CFR 38.34 - 38.38):** Compliant – LCWDD complies with all required notice and communication requirements. LCWDD met full compliance with the federal requirements (29 CFR 38.39) for providing initial and continuing written notice and communication that it: does not discriminate on any prohibited ground; describes an individual's right to file a discrimination complaint; and, communicates the "Equal Opportunity is the Law" Notice to individuals with disabilities and to other populations with special needs.

**Contract and Assurances 29 CFR 38.25:** Compliant – LCWDD documented written assurances including the required nondiscrimination and equal opportunity language in all grants, cooperative agreements, plans, contracts, and other similar documentation. Maintenance of written documentation was also self-assessed as adequate for the required nondiscrimination and equal opportunity language included in all grants, cooperative agreements, plans, contracts, and other similar documentation.

**Affirmative Outreach 29 CFR 38.40:** Compliant – LCWDD established workforce satellite centers throughout their workforce area and has effectively provided assurance of ensuring that an equivalent level of information regarding aid, benefits, services, and training is provided to all populations of eligible participants.

**Accessibility Requirement Pursuant to 29 CFR 38.13:** Compliant – Self-assessments revealed compliance with the Illinois Accessibility Code. Individuals with disabilities are provided an equal opportunity to participate in and benefit from Federally funded programs and services to access in LCWDD workNet centers per WIOA Section 188 and the Illinois Accessibility Code (71 IAC §400 [b]), 29 CFR 32, and Subparts B and C for 504 of the Rehabilitation Act.

**Programmatic Accessibility 29 CFR 38.13(b) & CFR 38.14:** Compliant – LCWDD implemented reasonable accommodation processes to serve persons with disabilities.

**Communication with individuals with disabilities pursuant to CFR 38.15(b):** Compliant – LCWDD list the Illinois Relay Service number on their outreach and marketing materials.

**Communication with individuals with disabilities pursuant to CFR 38.15 (5) (i-ii):** Noncompliant - LCWDD's website <https://www.lakecountyil.gov//167/Job-Center-of-Lake-County> had "3 known problems", "1 Likely Problems" and "339 potential problems" for accessibility using WCAG 2.0 (Level AA) *AChecker Web Accessibility Checker*. The problems identified focused on the website's need to make it easier for users to see and hear content including separating foreground from background. The review's known problems are specifically listed below:

**Problem:** The contrast between the color of text and its background for the element is not sufficient to meet WCAG2.0 Level AA.

**Repair:** Use a color contrast evaluator to determine if text and background colors provide a contrast ratio

**Collection and maintenance of equal opportunity data and other information (29**

**CFR 38.41):** Compliant - LCWDD enters all registrant data into a data base which is uploaded to the Illinois Workforce Development System and has utilized quantitative statistical reports using standard deviation for statistical/quantifiable analysis of the recipient's compliance with WIOA equal opportunity policy.

**Medical or Disability Information Records 29 CFR 38.41(3):** Compliant – Self-assessment of client case files demonstrated a reasonable guarantee that confidential information is secured appropriately.

**Compliance Monitoring 29 CFR 38.31:** Complaint – Reviews demonstrated sub grantee monitoring during the review period per EO Policy Letter No. 00-007. LCWDD also guaranteed future periodic monitoring for determining whether sub-recipients comply, and will continue to comply, with the requirements for implementation of the Nondiscrimination and Equal Opportunity provisions of WIOA (29 CFR 38.51).

**Complaint Processing Procedures 29 CFR 38.69 - 38.89:** Compliant – LCWDD established written complaint processing procedures and provided their recipients with those procedures. LCWDD effectively provided assurance for procedures that provide the complainant with the option to file with the recipient, the State, or directly with the USDOL Civil Rights Center.

**Limited English Proficiency (29 CFR 38.9):** Compliant –All locations posted the "Equal Opportunity is the Law" notice in several USDOL required languages. Staff understands how to assist clients with Limited English Proficiency (LEP) options using a variety of services for language translation and transcription services.

**Conclusion:**

This review provides the necessary assurances that LCWDD's EO policies, programs, procedures, records, and reports comply with State and Federal EO requirements. Please continue to monitor the Contract Service Providers that your LWIA has approved on the State Master Contract List. DCEO would like to thank you for your cooperation in this self-assessed review and no further action is required at this time.