



# Memorandum



Miami-Dade County Office of the Inspector General  
A State of Florida Commission on Law Enforcement Accredited Agency  
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To: Mr. Roderick Beasley, Executive Director

From: Mary T. Cagle, Inspector General

Date: November 1, 2018

Subject: Receipt of Status Report and Audit Closeout of the OIG's Final Audit, *South Florida Workforce Investment Board d/b/a CareerSource South Florida – Providers Youth Co-Op, Inc. and Arbor E&T, LLC*, Ref: IG 16-0030A

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On July 19, 2018, the Office of the Inspector General (OIG) issued its Final Audit Report regarding the above-captioned matter.<sup>1</sup> In that final report, the OIG requested that the South Florida Workforce Investment Board (SFWIB) provide a status report regarding its implementation of the OIG's recommendations. The OIG is in receipt of your status report, dated October 18, 2018 (attached). Thank you.

The OIG has thoroughly reviewed your status report and we are quite satisfied that the audit recommendations have been sufficiently addressed. The OIG is encouraged that the new measures developed by SFWIB will increase transparency in its job placement reporting by delineating the types of employment attained (e.g., temporary, seasonal, part-time etc.). Future reporting of job placements should eliminate any misinterpretations regarding the number of individuals placed in permanent, full-time positions. Additionally, the OIG is pleased that administrative procedures have been bolstered to make clear the documentation required in order to support a job placement.

The OIG considers this audit closed, and as such, no further action is required by SFWIB. The OIG would like to thank SFWIB staff and the audited providers for making available all records required to conduct the audit.

cc: Honorable Carlos Gimenez, Mayor, Miami-Dade County  
Honorable Chairman Esteban L. Bovo  
and Members, Board of County Commissioners, Miami-Dade County  
Cathy Jackson, Interim Commission Auditor, and Director, AMS.  
Cissy Proctor, Executive Director, Florida Department of Economic Opportunity  
James E. Landsberg, Inspector General, Florida Department of Economic Opportunity  
Mark Douglass, President, Arbor E&T, LLC  
Maria Rodriguez, President, Youth Co-Op, Inc.

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<sup>1</sup> <http://www.miamidadeig.org/Reports2018/FinalAuditReport-CareerSourceSouthFlorida.pdf>

October 18, 2018

Ms. Mary Cagle  
Inspector General  
Miami-Dade County  
Office of the Inspector General  
601 NW 1<sup>st</sup> Court, South Tower, 22<sup>nd</sup> Floor  
Miami, FL 33136

Re: Status Report to Office of the Inspector General (OIG) Audit Report

Dear Ms. Cagle:

South Florida Workforce Investment Board (SFWIB)/CareerSource South Florida (CSSF) is providing an update to the Office of the Inspector General's (OIG) Audit Report IG16-0030-A. CSSF would like to thank you for conducting the audit, as stewards of the tax payers dollars, CSSF always strives to provide the very best in services both effectively and efficiently.

As indicated in the Audit Report, Federal Law/Regulations allow Local Workforce Development Boards to report multiple job placements on an individual within a program year. Those procedures reference Federal Regulation 20 CFR 651.10 as the official guidance on what is required to record a job placement. As indicated in the July 2, 2018 response letter, since program year 2014 CSSF has limited the reporting of an individual jobseeker to one placement per program year. The limitation policy was a part several policies CSSF implemented to enhance employment services to jobseekers and strengthen the accountability of information reported.


Additionally, when the OIG staff brought an issue our attention, CSSF staff immediately addressed the issue by evaluating practical solutions, and implementing the appropriate measure to resolve the issue. The following are solutions implemented in our original response in the July 2, 2018 letter:

- In May of 2017, CSSF implemented several policy and system changes to strengthen programmatic oversight. CSSF revoked system access to those Career Center staff involved reassigning job placements, as well as, implemented new restrictions on all contracted provider staff to prevent the reassignment of placements to different Career Centers in the Employ Florida Marketplace (EFM) system. CSSF modified workforce services contracts for all Career Center providers to prohibit this practice.
- Federal/State regulations allow local workforce boards to report multiple placements; however, in program year 2014-15, CSSF executed performance base contracts for Career Center service providers. The contract modification were implemented to ensure credit is not given to the Career Centers for multiple placements during a program year.

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A key aspect of the CSSF contract modification is count a job placement only once per distinct social security number for the same jobseeker within the program year. This checks and balance process is fully automated through the programming of the CSSF Balance Scorecard and Automated Payment Invoice System, which is proprietary to this Region.

- In February of 2018, CSSF also developed an electronic customer satisfaction survey to validate the services received by the participant at the Career Centers when a direct job placement is entered in EFM. The CSSF Information Technology (IT) Unit controls this process and the Career Centers do not have the ability to view or tamper with the results. Should the participant indicate services were never received at the Career Center, the placement is removed from EFM, and the Career Center is not eligible for payment.
- Moreover, CSSF has developed electronic internal control systems to evaluate the quality of job order, referral processes and job placements of the Career Centers. The electronic evaluation process is conducted daily. The system was designed to ensure Career Centers are providing services in accordance with 20 CFR 651.10.
- In September of 2016, CSSF has a general auditing process of all placements entered into the EFM system by Career Centers to ensure accountability and accuracy of data reported. CSSF implemented the automation of the review of placements and developed the Placement Verification Report. Prior to September 2016, the process was manual using a two-layer approach, whereas the DEO Programs Unit performed reviews on the front-end and the OCI Quality Assurance Unit performed the reviews on the back-end. Because of the automation, CSSF is able to validate more placements, increase the accuracy of the validation process and reduce manpower hours.

Please find below a status update from South Florida Workforce Investment Board (SFWIB)/CareerSource South Florida (CSSF) in response to the OIG Audit Report recommendations, which improves accountability and ensures compliance with the Workforce Innovation and Opportunity Act (WIOA).

CSSF modified its workforce services contracts to include the items below:

1. Limited the number of Universal/Standard Direct Job Placements a provider can be compensated for each month.
  - Universal/Standard Direct Job Placements are typically individuals with no barriers to employment such as; receiving public assistance, having a criminal background or individuals that are physically or mentally disabled. These individuals do not require a lot of assistance and are usually easy to place. By limiting the number of "easy" placements, providers must focus more attention on the "harder to serve" population.



2. Increased the payment amount for full-time Direct Job Placement in the hard to serve categories (i.e. Homeless, Veterans, Disable, Ex-Offenders, and Welfare Transition).
  - In support of the previous action, CSSF will pay more for Direct Job Placements of individuals with barriers to employment or individuals that no longer require public assistance as a result of now being employed in a full time and permanent position.
  - Full-time employment is define as 30 hours or greater per week in a duration of 150 days or more.
3. The payment for Obtained Employment has been discontinued.
  - Previously, providers were compensated for providing supportive services that assisted the jobseekers in obtaining employment on their own such as, writing their resumes for them. This process has been discontinued and those resources have been shifted to pay higher rates for servicing the hardest to serve.
4. The regional Job Order function has been centralized and is being performed by the Department of Economic Opportunity (DEO) Job Bank staff to control the types of job orders (i.e. full time vs part time) that are entered in the system.
  - Previously, each provider and/or the employer had the ability to enter job orders into the Employ Florida system (State Employment data base). The job orders were checked for Human Resources laws/restrictions but were not controlled for the types of jobs being entered, i.e. full-time vs. part-time.
  - By centralizing the job bank, CSSF will have a better situational awareness on the types and volume of each type of job order that is entered into the system. CSSF will then be able to focus employer recruitment efforts to increase the number of full-time positions and long-term positions to maintain a balance with the seasonal and temporary opportunities that routinely are offered, for example in support of our local sports teams such the Marlins, Dolphins and Heat. While they employ many people each year they are all temporary employment.

CSSF has also completed and/or implemented the following enhancements:

5. The Balance Scorecard Direct Job Placement (DJP) Report has been modified to identify: Seasonal, Temporary, Part-time and Full-time employment. Refer to attached Balance Scorecard Report.

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Miami-Dade County  
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- Federal regulations 20 CFR. 651.10 define how a workforce board is credited for a Direct Job Placement. However, the regulation does not state any other reporting requirements or require the separation of placements into the aforementioned categories. In an effort to be transparent as to the placements that are occurring and the types of jobs that are available, CSSF has modified its reporting structure to indicate the specific type of placement that is being reported.
6. SFWIB Administrative Order for Work Registration, Job Referral and Job Placement Requirements. Refer to attached Administrative Order on Work Registration, Job Referral and Placement Requirements.
- In an effort to continue to improve the Regional service delivery system, SFWIB staff developed administrative requirements that clearly define a complete job seeker work registration, job referral, and job placement in Local Workforce Development Area (LWDA) 23. The requirements will enhance the job seekers work registration profile and will help ensure that Career center staff provide quality services and job referrals to increase LWDA 23 employment outcomes.
  - The development of these requirements will create a standard for LWDA 23 to ensure compliance with all federal and state policies and guidelines. It will also improve the quality of services in LWDA 23 centers to both businesses and job seekers. The requirements will be implemented through an Administrative Order.

Please feel free to call me at (305) 929-1501 or Frances Gonzalez at (305) 929-1520, should you have any questions or concerns.

Sincerely,


Rick Beasley  
Executive Director  
South Florida Workforce Investment Board

*Attachments*

Pc: David Gilbert, Adult Programs Manager, CSSF  
Robert Smith, Adult Programs Supervisor, CSSF  
Yian Perrin, DEO Programs Manager, CSSF  
Frances Gonzalez, Quality Assurance Coordinator, CSSF  
Audit File

# CSSF Balanced Scorecard Report

Report Date: 7/1/2018 To 10/15/2018

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## ADMINISTRATIVE ORDER

<b>SUBJECT:</b>	<b>Work Registration, Job Referral and Placement Requirements</b>	<b>Administrative Order No.</b>
<b>APPLIES TO:</b>	<b>All SFWIB Staff, Center Staff, Workforce Contracted Staff and Youth Contracted Staff</b>	<b>Effective Date:</b> Immediate
		<b>Revised Date:</b>
		<b>Expiration Date:</b> Indefinite
<b>REFERENCE</b>	<b>Job Order and Placement: DEO Administrative Policy 099</b>	

### A. PURPOSE

The purpose of implementing these requirements is to provide guidance on the minimum for documenting and completing a jobseekers work registration, job referral and the recording of placements in Employ Miami Dade (EMD) or Employ Monroe (EM) for Local Workforce Development Board (LWDB) 23.

### B. BACKGROUND

The purpose of the EMD and EM employment service system is to bring together qualified jobseekers and employers. Additionally, each LWDB must administer a labor exchange system that can:

- Assist jobseekers in finding employment, including promoting their familiarity with EMD or EM;
- Assist employers in filling vacancies;
- Facilitate the match between jobseekers and employers;
- Participate in a system for clearing labor among the states, including the use of a standardized classification system;
- Meet the work test requirements of the Reemployment Assistance program; and
- Provide labor exchange services as identified in Section 7(a) of the Wagner-Peyser Act.

<b>Approved By:</b> Rick Beasley, Executive Director	<b>Update to</b>	<b>Issued by:</b> David Gilbert
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## C. POLICIES AND PROCEDURES

### 1. Complete Work Registration

A complete EMD or EM registration must include all of the following components; a complete and current General Information section containing a verified residential and mailing address, a valid telephone number, and e-mail address. The jobseekers must also have been assigned an occupation title and occupation code (O\*NET code). Additionally, staff must complete the Background Wizard section to include the Education Profile, the Employment History with previous hourly wages, O\*NET code. To complete the registration, the jobseekers must have an active/online résumé that is viewable to employers, with a valid telephone number and e-mail address.

### 2. Job Referrals

A job referral is the act of facilitating the match between qualified jobseekers and employers with job openings; and the recording of such referral in EMD or EM. Prior to referring a jobseeker to a job opening, staff must ensure the jobseeker's qualifications match the minimum requirements listed in the job order by ensuring that the General Information section, Background Wizard section, and the résumé on their personal profile includes all the jobseekers skills, abilities, prior work experience, education and training, certifications and licensure. These items should be consistent with the requirements of the job order. Staff must ensure that job referrals are only provided to jobseekers that have completed work registration and who meet the minimum requirements as stated in the job order. **At no time should a staff member alter the minimum requirements of a job order to increase a jobseekers skills match.** Additionally, staff must obtain the consent of the jobseeker prior to making any job referral. Staff must enter a case note in EMD or EM to document the consent of the jobseeker.

### 3. Job Placements

A job placement is the hiring by a public or private employer of an individual referred by staff, for a job or an interview, and where the staff completed each of the following steps:

- Prepared a job order form for a job previously approved by an employer and submitted it to the Job Bank for approval and entry prior to the referral or prior to the position being filled, except in the case of a job development contact on behalf of a specific individual;
- Made prior arrangements with the employer for the referral of an individual or individuals;
- Obtained the individual's consent to be referred to the job order;
- Referred an individual who had not been specifically designated by the employer, except for referrals on agricultural job orders for a specific crew leader or worker;
- Verified from a reliable source, preferably the employer, the individual was hired and started work; and
- Properly recorded the placement.

Staff must verify the jobseeker began working prior to recording the appropriate placement code. Verification information must be documented and must include a case note identifying:

Approved By: Rick Beasley, Executive Director	Update to	Issued by: David Gilbert
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- The jobseeker's name;
- The name of the employer;
- The job title of the position and starting wage;
- The source of verification; and
- The date the customer started working at the designated jobsite.

Notification of an upcoming start or hire date is not acceptable for recording a placement. For all placements with a staffing agency or other similar type of employers that provides contracted or temporary labor; staff must also obtain documentation (i.e. pay stub or payroll register) that authenticates the jobseeker was assigned to a worksite and has earned wages. The first paystub after start date is preferred.

Note: Pursuant to 20 CFR 652.3, staff must ensure the O\*NET code used for a specific job opening matches the job description. If no match can be found, staff must use the title the employer or third-party agent provided. Only one O\*NET code may be used per job order. Placement into job openings that do not match the description in the job order or O\*NET code is not permissible.

#### **D. AUTHORITY**

[Wagner-Peyser Act of 1933, as amended by the Workforce Innovation and Opportunity Act of 2014](#)

[Workforce Innovation and Opportunity Act of 2014](#)

[20 CFR 651.10, 652, 653.501](#)

[29 CFR 1604, 1606, 1625](#)

[42 U.S.C. 2000](#)

[Fair Labor Standards Act](#)

[ETA 9002 and VETS 200 Data Preparation Handbook; ETA Handbook No. 406](#)

[Vietnam Era Veterans' Readjustment Act of 1972](#)

[Chapter 760 Florida Statutes](#)

Approved By: Rick Beasley, Executive Director	Update to	Issued by: David Gilbert
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