



DEPARTMENT OF ECONOMIC OPPORTUNITY
 CareerSource Pinellas (CSPIN)
 LWDB 14 Preliminary Review Summary
 May 11 - 21, 2020

WELFARE TRANSITION (WT) PROGRAM

Participant Case File Review

A total of 39 participant case files were reviewed.

2019-2020 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
WT / TANF	1. There was an instance where a participant received mandatory child care services without receiving cash assistance for that month.	<u>TANF State Plan 2017-2020, (s. 414.075, F.S.)</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure that mandatory childcare services are not provided unless the participant is receiving cash assistance.
	2. A safety plan was not developed with a participant. Additionally, elements from a safety plan were not included in the IRP/ARP for victims of domestic violence.	<u>Domestic Violence Guidance AWI F G 02-026 and Relocation Guidance AWI FG 01-023.</u>	N	Y	N/A	N/A	N/A	The LWDB program staff must develop a safety plan for all participants that disclose they are victims of domestic violence and ensure that elements from the safety plan are included in the IRP/ARP for victims of domestic violence to identify resources, address barriers to self-sufficiency and to outline the steps to help keep the family safe.
	3. There were several instances where the IRP did not include all three required elements (employment goals, assigned weekly activities, and services provided to participants). Additionally, a participant was assigned to	<u>45 CFR 261.11, TANF State Plan, 445.024(F.S.), Memorandum dated October 22, 2014- Initial Assessments (IAs), Florida's</u>	N/A	N/A	Y	Y	N/A	LWDB staff must be reminded that an IRP must be updated to include all required elements anytime changes occur with the participant and/or they have met with program staff and were assigned to a work activity. Additionally, staff must be reminded that participants cannot be assigned

	more than 40 hrs/wk in work activities.	<u>Work Verification Plan, Individual Responsibility Plans (IRPs) and Alternative Requirement Plans (ARPs), entered in One Stop Service Tracking (OSST) System.</u>						to more than 40 hrs/wk in work activities.
	4. Documentation to support JPR hours was not retained in a couple of participant case files.	<u>F.S. 445.010, 45CFR 260.61-62, 45CFR 262, and Florida's Work Verification Plan.</u>	Y	Y	N/A	N/A	N/A	The LWDB must ensure that documentation or other forms of allowable verification as described in the approved Work Verification Plan are retained in the participant case file and auditable.
	<p>5. The following issues were identified for the pre-penalty and sanction process:</p> <ul style="list-style-type: none"> • A participant was not allowed three working days to provide good cause for a second failure within 30 days and the required DEO WTP-2292 form was not mailed. • There was no evidence of a verbal attempt to contact and/or counsel a participant during the 10-day counseling period when a pre-penalty was initiated. • In several instances, pre-penalties and sanctions are not being initiated or requested in the OSST system in a timely manner. 	<u>45 CFR 261.14, 414.065 (F.S.), 65A-4.205, Florida Administrative Code, and FG 03-037.</u>	Y	Y	N/A	N/A	N/A	LWDB staff must ensure that participants are allowed three working days to provide good cause for a second failure within 30 days and the required DEO WTP-2292 form is mailed. Additionally, LWDB staff must ensure that an attempt to contact the participant during the 10-day counseling period is conducted and case notes are entered in OSST. The case notes must clearly state that the participant was counseled regarding the failure. Staff should also be reminded that the pre-penalty process must be initiated at the time the failure occurred and that program participants should not be given extra time to comply with program requirements.

	6. There was an instance where employment documentation in a participant case file, did not match the information entered in OSST	<u>445.010 (f) F.S.</u>	N/A	N/A	Y	Y	N/A	LWDB staff must ensure that employment documentation (employment verification form/telephone verification form/OSST case notes) matches the information entered into the OSST system and is retained in the participant's case file.
	7. Staff are not ending services and closing cases in OSST timely. Cases remained open for an extended period without any activities or services being provided. Note: LWDB staff are following up with the WT Policy Unit to determine the process for closing out cases coded under 487.	<u>Reporting Data</u>	N/A	N/A	N/A	N/A	Y	LWDB staff must ensure that all services and activities are ended in OSST and the case is closed if ongoing participation is not required.
Totals			2	4	2	2	1	

NON-CUSTODIAL PARENT EMPLOYMENT PROGRAM (NCPEP)

Participant Case File Review

The sample size consisted of one participant case file.

The NCPEP case files were reviewed to verify if participant eligibility was appropriately determined and that program enrollment dates in the system were entered on or after the eligibility determination dates. It should be noted that CSPIN is no longer the custodian of NCPEP records and going forward CareerSource Pasco Hernando is the custodian of NCPEP records for 14, 15 and 16 if applicable.

Observation: There was an instance where an NCPEP case was left open for an extended period and not closed out in OSST, after the participant completed the program.

Recommendation: LWDB staff must ensure that all NCPEP services are ended and the case is closed immediately, after completion of the program.

TANF SUMMER YOUTH EMPLOYMENT PROGRAM (SYEP)

Participant Case File Review

The sample size consisted of 10 participant case files.

The SYEP is a subsidized summer employment program designed for low-income youth. The team reviewed the SYEP case files to verify if participant eligibility was appropriately determined and that program enrollment dates in the system were entered on or after the eligibility determination dates.

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

SUPPLEMENTAL NUTRITION ASSISTANCE EDUCATION AND TRAINING PROGRAM (SNAP E&T)

General Comment

A review of the LWDB’s local operating processes and practices revealed that the LWDB has policies and procedures in place for conducting their local SNAP E&T program. CSPIN maintains an oversight and quality assurance process that examines programmatic operations and practices. Copies of local monitoring procedures and reports were provided to DEO monitors to support the LWDB’s monitoring activities. It is recommended that the LWDB update the following LOP sections:

- Job Search and Job Search Training: limit of 39 hours in a single month when in conjunction with another component verbiage.
- Work Experience: a fully completed and signed worksite agreement maintained in the case file or a central accessible location verbiage.
- Initial Engagement: update process of a participant attending an initial appointment early. If this occurs reschedule appointment date and time. This will ensure OSST displays appointment status ended within two days.

Participant Case File Review

A total of 39 participant case files were reviewed.

Case files reviewed contained documentation of eligibility and other case management elements, and participant data recorded in OSST was determined to have been correctly entered based on case file documentation requirements in sample files reviewed.

2019-2020 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
Supplemental Nutrition Assistance Education and	1. A participant was assigned to more than 120 hours in JPR activities in combination with employment.	<u>7 CFR 273.7; 7 CFR 273.24(a)(1)(i); State Plan.</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure staff accurately counts, verifies and enters hours correctly into OSST.

Training Program (SNAP E&T)								
Totals			0	1	0	0	0	

COLLECTION OF DEMOGRAPHIC DATA

The Demographic Process review tool was used to gather information about CSPIN’s practice of collecting demographic information. Staff indicated CSPIN collects demographic information when jobseekers register in One-Stop lobby. CSPIN submitted screenshots that includes a statement informing customers that providing demographic information is voluntary and is kept confidential as provided by law. No issues were found.

FINANCIAL DISCLOSURE

In reviewing the Financial Disclosure Process Tool, CSPIN board members have filed their Financial Form 1F with the appropriate entity. LWDB has posted all board meeting minutes to their website. No issues were found.

WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

ADULT AND DISLOCATED WORKER PROGRAM

Participant Case File Review

A total of 27 participant case files, (11 adults and 16 dislocated workers) were reviewed.

2019-2020 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated	1. In several instances, the On-the-Job training and Customized Training contracts/agreements did not specify that funds will not be used to:	<u>WIOA Sec.122 (h), 20 CFR 680.830-840, WIOA Sec. 134(c)(3)(A), and Local Workforce Service Plan and</u>	N	Y	N/A	N/A	N/A	On-the-Job training (OJT) and Customized Training are considered work-based training activities and falls under the guidelines of how work-based funds provided to employers

Worker Program	<ul style="list-style-type: none"> • directly or indirectly assist, promote, or deter union organizing. <p style="text-align: center;">and/or</p> <ul style="list-style-type: none"> • aid in the filling of a job opening which is vacant because the former occupant is on strike or locked out in the course of a labor dispute or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. 	<u>Administrative Policy 009.</u>						must or must not be used. CSPIN must ensure that OJT /CT agreements or attachments to the agreement, contain the required verbiage.
	2. In several instances, participants who were enrolled in an education or training program did not have a Measurable Skills Gain (MSG) recorded in the applicable program year.	<u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u>	N/A	N/A	Y	Y	N/A	CSPIN must ensure that participants who are enrolled in an education or training program have an MSG recorded in the applicable program year. If the includable activity crosses program years, a MSG for each program year must be captured.
	3. In several instances, quarterly follow-ups were not conducted by the required quarterly due date.	<u>20 CFR 677.155 and 175, WIOA Sec.116 TEGL, and Follow-up Memorandum 3/23/07, Master Cooperative Agreement.</u>	N/A	N/A	Y	Y	N/A	Case managers must ensure that the date stated on the certificate is recorded in Employ Florida as the attainment date, not the date the case manager received the credential from the participant.
	4. In two instances, follow-up services were not offered to a	<u>20 CFR 680.150, WIOA Sec. 134(c) (2)(A)(xiii), TEGL 19-</u>	N	Y	N/A	N/A	N/A	Case managers must ensure that case notes are developed at least

	participant who exited with employment.	<u>16, Local Follow-up Policy.</u>						monthly. This will give newly assigned case manager and/or reviewer an insight of the participant's progress.
	5. In several instances, the supportive services activity documented in the case file does not match the supportive services activity entered in the State's MIS.	<u>20 CFR 680.900-970, WIOA Sec. 3 (59) and Sec. 134(d)(2), and Local Supportive Service/Incentive Policy</u>	N/A	N/A	N	Y	N/A	CSPIN must ensure that the documentation for supportive services matches the activity assigned in the State's MIS.
Totals			0	2	2	3	0	

WIOA YOUTH PROGRAM

Participant Case File Review

A total of 13 Youth participant case files, (ten Out-of-School and three In-school) were reviewed.

2019-2020 Monitoring Results								
Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
Workforce Innovation and Opportunity Act (WIOA) Youth	1. In several instances, a measurable skills gain (MSG) was not recorded in Employ Florida for the applicable program year in which the participant was enrolled in an educational or training program.	<u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u>	N/A	N/A	Y	Y	N/A	CSPIN must ensure that participants who are enrolled in an education or training program have an MSG recorded in the applicable program year. If the includable activity crosses program years, a MSG for each program year must be captured.
	2. In one instance, the case file does not contain the MSG documentation showing the participant's interim progress toward	<u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u>	N/A	N/A	N	Y	N/A	CSPIN must ensure that the case file contains MSG documentation showing the participant's interim progress toward the

	the completion of their educational or training requirements.							completion of their educational or training requirements.
	3. In several instances, the Individual Service Strategy in the case file was not updated to document activities completed, benchmarks reached, goals achieved, and/or the change in the youth's needs.	<u>WIOA Sec. 129 (c) (1) (B) and (c) (2), 20 CFR 681.420(a)(2).</u>	N/A	N/A	N	Y	N/A	CSPIN must ensure that the Individual Service Strategy is updated to document activities completed, benchmarks reached, goals achieved, and/or the change in the youth's needs.
	4. In a couple of instances, the supportive services/incentive activity documented in the case file does not match the supportive services activity entered in the State's MIS.	<u>WIOA Sec. 3 (59), 20 CFR 681.640, Local Supportive Service/Incentive Policy and Special Project Contract.</u>	N/A	N/A	N	Y	N/A	CSPIN must ensure that the supportive services/incentive activity documented in the case file matches the supportive services activity entered in the State's MIS.
	5. In several instances, the documentation in the participant's case file does not support credential attainment.	<u>Federal Data Validation Requirements TEGL 10-16 Change 1, WIOA, Sec. 3(52), WIOA Sec. 129 (c) (1) (C).</u>	N	Y	N/A	N/A	N/A	CSPIN must ensure that there is documentation in the case file to support the credential attainment.
Totals			0	1	1	4	0	

SPECIAL PROJECTS

- WIOA-Incumbent Worker-20% Non-Waiver- Two participant case files
- Construction Trade and Apprenticeship Training Program- Five participant case files
- Sector Strategies (IT Training)-Four participant case files
- TechHire-Non WIOA-Four participant case files
- Soft Skills Development-Five participant case files

Participant Case File Review

A total of 20 participant case files were reviewed.

2019-2020 Monitoring Results

Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year Other Noncompliance Issue	Current Year Other Noncompliance Issue	Observation	Recommendation
Workforce Innovation and Opportunity Act (WIOA) Special Projects <ul style="list-style-type: none"> Incumbent Worker 	1. In two instances, documentation of the Individual Career Service (Career Guidance) was missing from the participant case file.	<u>20 CFR 678.430, WIOA Sec.134 (c)(2)(A)(xii) and TEGL 19-16, 20 CFR 680.230, TEGL 4-15.</u>	N	Y	N/A	N/A	N/A	When individual career services are provided, documentation of the services must be maintained in the participant’s case file or a case note must be provided documenting the service.
<ul style="list-style-type: none"> TechHire Sector Strategies Construction Trade and Apprenticeship training 	2. In several instances, the supportive services activity documented in the case file does not match the supportive services activity entered in the State's MIS.	<u>20 CFR 680.900-970, WIOA Sec. 3 (59) and Sec. 134(d)(2), and Local Supportive Service/Incentive Policy</u>	N/A	N/A	N	Y	N/A	CSPIN must ensure that the documentation for supportive services matches the activity assigned in the State’s MIS.
<ul style="list-style-type: none"> Sector Strategies 	3. In one instances, the employment at exit information recorded in Employ Florida did not match the information on the employment verification form found in the participant’s case file.	<u>Federal Data Validation Requirements.</u>	N/A	N/A	N	Y	N/A	CSPIN must ensure that information recorded in Employ Florida matches the documentation maintained in the participant’s case file.
<ul style="list-style-type: none"> Construction Trade and 	4. In several instances, participants who	<u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u>	N/A	N/A	Y	Y	N/A	CSTB must ensure that participants who are enrolled in an education or

<ul style="list-style-type: none"> Apprenticeship training TechHire 	<p>were enrolled in an education or training program did not have a Measurable Skills Gain (MSG) recorded in the applicable program year.</p>							<p>training program have an MSG recorded in the applicable program year. If the includable activity crosses program years, a MSG for each program year must be captured.</p>
<ul style="list-style-type: none"> Soft Skills Development-Youth 	<p>5. In one instance, the case file does not contain the MSG documentation showing the participant's interim progress toward the completion of their educational or training requirements.</p>	<p><u>20 CFR Part 677.155 (a)(v), WIOA Sec. 116 and TEGL 10-16 Change 1.</u></p>	N/A	N/A	N	Y	N/A	<p>CSPIN must ensure that the case file contains MSG documentation showing the participant's interim progress toward the completion of their educational or training requirements.</p>
<ul style="list-style-type: none"> Incumbent Worker TechHire Sector Strategies 	<p>6. In a few instances, follow-up services were not offered or provided to participants who exited the program with unsubsidized employment.</p>	<p><u>20 CFR 680.150, WIOA Sec. 134(c) (2)(A)(xiii), TEGL 19-16, Local Follow-up Policy.</u></p>	N	Y	N/A	N/A	N/A	<p>The LWDB must ensure quarterly follow-up services are offered to each participant who enters employment after exit.</p>
<ul style="list-style-type: none"> Incumbent Worker 	<p>7. In several instances, the Customized Training contracts/agreements did not specify that funds will not be used to:</p> <ul style="list-style-type: none"> directly or indirectly assist, promote, or deter union organizing. 	<p><u>WIOA Sec.122 (h), 20 CFR 680.830-840, WIOA Sec. 134(c)(3)(A), and Local Workforce Service Plan and Administrative Policy 009.</u></p>	N	Y	N/A	N/A	N/A	<p>Customized Training is considered work-based training activities and falls under the guidelines of how work-based funds provided to employers must or must not be used. CSPIN must ensure that CT agreements or attachments to the agreement, contain the required verbiage.</p>

	and/or <ul style="list-style-type: none"> aid in the filling of a job opening which is vacant because the former occupant is on strike or locked out in the course of a labor dispute or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. 							
Totals			0	4	1	4	0	

TRADE ADJUSTMENT ASSISTANCE (TAA)

Participant Case File Review

A total of five participant case files were reviewed.

The review did not reveal any Findings, Other Noncompliance Issues or Observations.

WAGNER-PEYSER (WP) PROGRAM

Participant Case File Review

A total of 70 (27 job seekers, 20 job orders, 15 placements, and eight RESEA) case files were reviewed.

2019-2020 Monitoring Results

Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
Wagner – Peysler	The following issues were	<u>20 CFR 652.207, 652.3, DEO AP</u>	Y	Y	N/A	N/A	N/A	LWDB staff must ensure when registering individuals in Employ

(WP)	<p>noted with job seeker services and activities:</p> <ul style="list-style-type: none"> • A couple of job seekers did have case notes indicating they granted LWDB staff permission to create their account in Employ Florida • Multiple job seekers with an Employ Florida staff-entered registration after 5/24/2019 did not have a case note documenting permission to create the account in Employ Florida. Additionally, multiple job seekers received services that initiated participation prior to completion of a full registration. • Job seeker's permission was obtained in a case note after the job seeker registration creation date entered in Employ Florida; the case note granting permission was entered almost two months later. 	<p><u>096 (rev. 5/24/2019)</u></p> <p><u>DEO AP 096 (rev. 5/24/2019)</u></p>						<p>Florida, job seeker permission is documented in a case note on the job seeker's Employ Florida account. Additionally, the LWDB must ensure a full registration (including assignment of an O*NET and either completion of the background wizard or entry of a resume) is completed prior to providing a service that initiates participation.</p> <p>LWDB staff must ensure the job seeker registration is created on prior to or on the same day as the registration.</p>
	<p>2. A MSFW were not properly coded in Employ Florida. Additionally, an MSFW was not provided a referral to a support service.</p>	<p><u>20 CFR 653.103(a), 20 CFR 651.10; DEO FG 03-040; MSFW Desk Aid</u></p>	N	Y	N/A	N/A	N/A	<p>The LWDB staff must ensure all new and returning MSFW job seekers are properly identified and coded in Employ Florida. Prior to entering a service which initiates participation, the LWDB staff must ensure the MSFW is coded correctly. The MSFWs application must identify a sufficient work history in farm</p>

								work in Employ Florida or in case notes to verify MSFW status. MSFWs must also be provided a referral to a support service and the appropriate Employ Florida code must be entered (code 169 – 178).
	3. Multiple job orders with a wage rate listed below minimum wage did not have a case note on the job orders documenting staff verification that the employer will pay at least the Florida Minimum Wage rate.	<u>Fair Labor Standards Act/FL Statutes - Title XXXI Labor Section 448.01; DEO AP 099</u>	Y	Y	N/A	N/A	N/A	For job orders listed at or below minimum wage, staff must ensure they verify and document that the employer wage rate for the position is at or above the Florida minimum wage (unless exempt). Documentation must be recorded as a case note on the job order in Employ Florida
	2. A couple of job orders entered by employers or third-party agents were not verified by LWDB staff.	<u>20 CFR 651.10;20 CFR 652.3; DEO AP 099</u>	N	y	N/A	N/A	N/A	LWDB staff must ensure all job orders are verified and meet the requirement. This includes Perm Job orders.
	3. The LWDB did not conduct a compliance review for several employer-entered job orders. Additionally, a few other job orders were verified a few months after employer entry.	<u>20 CFR 651.10; DEO AP 099.</u>	Y	Y	N/A	N/A	N/A	LWDB staff must ensure employer-entered job orders are reviewed for compliance within two business days of entry in Employ Florida. The review must be documented in a case note in the system.
	4. Multiple job seekers with staff-entered Employ Florida registrations after 5/24/2019 did not have documentation of the job seekers' permissions to create the accounts in Employ Florida. 5. Additionally, several of those and other job seekers did not have a complete registration in	<u>20 CFR 652.207, 652.3, DEO AP 096 and 099 (rev. 5/24/2019).</u>	N	Y	N/A	N/A	N/A	LWDB staff must ensure when registering individuals in Employ Florida, job seeker permission is documented. LWDB staff must also ensure that a full registration is completed in Employ Florida prior to the provisions of the first service that initiated WP participation.

	Employ Florida prior to the provision of the first service that triggered WP participation.							
	6. LWDB staff did not request permission to create staff-referrals for a few job seekers to job orders after 5/24/2019.	<u>20 CFR 652.3 and DEO AP-099 (revised 5/24/2019).</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure that staff obtain and document permission prior to referring a job seeker to a job order.
	7. Several job seeker's applications/registrations in Employ Florida determined the job seeker did not meet the minimum requirements of the job order.	<u>20 CFR 652.3; DEO AP 096; DEO AP 0989</u>	N/A	N/A	Y	Y	N/A	The LWDB must ensure the job seeker's information is properly entered in Employ Florida registration/application to determine if the job seeker met the minimum requirements of the job order.
	8. A few participants were not allowed to exit ("soft exit") in Employ Florida when no further services were provided that extend participation.	<u>TEGL 17-05; DEO AP 099</u>	N	Y	N/A	N/A	N/A	LWDB must allow a participant to exit ("soft exit") in Employ Florida if no further services provided that extend participation.
Reemployment Services and Eligibility Assessment (RESEA)/WP Common Issue	9. A few RESEA and WP EDPs were missing specific action steps to reach either the short or long-range occupational goals. Additionally, many of the RESEA participants action steps and work search activities (WSA) were the same for the participants.	<u>20 CFR 651.10; 20 CFR 678.430; UIPL 8-18; CSF Admin Policy 068; Employ Florida Service Code Guide.</u>	N/A	N/A	Y	N	N/A	Staff must ensure that assessments are documented and evaluate/summarize the employment history, education, interests and skills that result in the identification of employment goals, barriers to employment and services needed to obtain goals. Staff must also ensure EDPs are documented and must contain specific short and long-term goals and the action steps to achieve those goals. The plans are to be conducted jointly with the customer to address their specific needs and should not be uniform. RESEA work search activities must also be tailored to the individual participant's needs.
RESEA								

Totals			3	8	2	1	0	
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CAREER CENTER CREDENTIALING

A Career Center Credentialing review was conducted to determine compliance with program guidance. The methodology for conducting the review will include self-certification by the LWDB that the following credentialing requirements had been met for the review period at each of the career center locations in the LWDA (posters, signage and resource room verification). All other administrative requirements and records (listing of front-line staff, continuing education hours attained, complaint system information, etc.) were reviewed by the monitor.

The monitor also reviewed the administrative documents provided to determine whether all “front-line” staff members had completed their required Tier I Certification courses and the 15 hours of continuing education courses in related subjects. As part of the credentialing process, the monitor reviewed the LWDB’s complaint system to ensure that a system is in place to process any Wagner-Peyser complaints received. No issues found.

MANAGEMENT INFORMATION SYSTEMS (MIS)

The LWDB did not provide policies and procedures ensuring that individuals who are no longer employed in the LWDB are promptly removed from having access to the MIS. The LWDB has not provided an up-to-date listing of all MIS users during the review period who have had their status revoked. The monitor was unable to match the names of terminated users on the LWDB ‘s list with user staff accounts maintained by DEO’s Internal Security Unit (ISU) to determine whether any of those individuals still had access to the system and/or if their privileges had been revoked.

The LWDB did not provide documentation to provide support to the policies and procedures ensuring a background screening was conducted for all new staff (Board, contractor, or provider) hired during the review period. Additionally, the LWDB did not provide documentation that all newly hired staff completed Individual Non-Disclosure and Confidentiality Certification forms and security access agreements.

2019-2020 Monitoring Results

Workforce Program	Issue	Applicable Reference	Prior Year Finding	Current Year Finding	Prior Year ONI	Current Year ONI	Observation	Recommendation
System Access	1. A few MIS users whose access was revoked during the review period still had access to the system after their termination/separation.	<u>Section 435.03435.04(2), F.S.; Grantee/Subgrantee Agreement – Exhibit B; DEO Policy 5.05.02.</u>	N	Y	N/A	N/A	N/A	The LWDB must ensure that all MIS access is revoked in a timely fashion when they have received notice to do so. MIS access policies and procedures must also be developed, maintained, and retained and provided when requested by DEO staff.
Background Screenings	2. The LWDB did not provide background screenings for staff (board, provider, or	<u>Florida Statutes Section 453.03</u>	Y	Y	N/A	N/A	N/A	Failure to complete required background screening places information resources at

	contractor) hired during the review period.	<u>Grantee/Subgrantee Agreement.</u>						increased risk (e.g., identity theft, data compromise, access to sensitive data by individuals who might be inclined to misuse data, etc.). At a minimum, LWDB staff and their contractors, subcontractors or agents with access to DEO data are required to undergo a Level 1 background screening through the FDLE as a condition of employment and continued employment.
Totals			1	1	0	0	0	