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Executive Committee May 14, 2025 2:00 pm to 2:45 pm

Note Location ⇒ ⇒			corn Way, Santa Rosa <b>ta Rosa Room</b>	
*Vot	e Required			
Ι.	Public Comment (2	:00)		(Discussion)
II.	Approve Minutes of April 9, 2025 <sup>*</sup> (2:02)			(Action*)
III.	WIB Business* (2:05) (Discussion/Acti			
	A. Finance <sup>*</sup>			
	i. High Perform	nance Board Funds <sup>*</sup>		
	B. Membership*			
	C. Request for App	roval: Adult Dislocated	Worker Career Service	es Provider <sup>*</sup>
	D. Request for App	roval: AJCC Operator*		
IV.	Prepare for Next W	B Meetings (2:30)		(Discussion)
VII.	Upcoming WIB Executive Committee Meetings and WIB Meetings (Discussion			gs (Discussion)
	June 11, 2025	Executive Session:	4:00 pm to 5:00 pm	In person / Zoom As Needed
	July 9, 2025	Executive Session:	2:00 pm to 2:25 pm	In person / Zoom As Needed
	July 9, 2025	Full Session:	3:00 pm to 5:00 pm	In person / Zoom As Needed
v.	Adjourn			
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**Open Meetings**: Except as expressly authorized under the Brown Act, all meetings are open to attendance by interested members of the public.

If WIB members are **unable to attend,** please **call (707)565-8500 prior to the meeting** to leave a message stating you are unavailable.

*Meeting Materials:* Materials related to an item on this Agenda submitted to the WIB after distribution of the agenda packet are available for public inspection in the WIB Administrative Office at 2227 Capricorn Way, Suite 100, Santa Rosa during normal business hours.

**Accommodation**: If you have a disability which requires the agenda materials to be in an alternative format or requires an interpreter or other person to assist you while attending this meeting, please call (707) 565-8500 at least 72 hours prior to the meeting, to facilitate arrangements for accommodation.

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# Workforce Investment Board

## **Executive Committee**

### DRAFT Minutes of April 9, 2025

Members Present: Brandy Evans, Stephen Jackson, Scott Kincaid, Michael Pickens, Judy Coffey and

Members Absent: Ananda Sweet

WIB Staff: Charity Doronila, Carol McHale, Michelle Revecho and Maureen Fifer

<sup>\*</sup> Indicates members who arrive late or leave a meeting early.

<sup>z</sup> Indicates member attended via Zoom.

#### I. Public Comment

None.

### II. Approve Minutes of March 12, 2025

# Motion to approve Minutes of March 12, 2025: Michael Pickens / Judy Coffey Approved (Brandy Evans, Stephen Jackson, Scott Kincaid, and Michael Pickens.) There were no abstentions. There were no "nay" votes. The motion carried.

#### III. WIB Business

- A. Attendance
  - No members are out of compliance.
- B. Finance
  - High Performance Board Funds

The WIB received an additional \$5,555 in funding for qualifying as a High Performing Board last year. Part of these funds were used to pay for the WIB Retreat lunch. Staff has until June 30, 2025 to spend the remaining \$2,292.55.

Discussed some options for funding. It cannot be moved over to a general WIB fund or used for travel. Recommendations included the following:

- > WIB advertising in a newspaper or trade magazine.
- ➢ Gift cards / bus passes for events giveaways.

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> Training for members.

Michelle will follow up with Finance on if there are any guidelines or limitations as to how the state and WIOA allow these funds to be used.

- C. Membership
  - There are no new applications for review at this time.
  - Noted that member Lauren Vasquez was employed by ESP when she was made a board member. ESP has been purchased and now will go by the name of Fortis Security Group. Her position will remain the same.
  - Noted that member Erin Carlson is now employed by Hyatt Regency.

## IV. WIB Local Plan

Michelle provided an overview of the WIOA Local Workforce Development Strategic Plan for 2025 to 2028. Highlights included:

- Overview of the plan development process.
- Review of top industries and projected top industries.
- Challenges such as job decline, retirements, political landscape, and local disasters.
- Goals and Strategies

Once approved the next step will be to get the Board of Supervisors to approve and then submit the plan to the state.

# Motion to approve the Sonoma County WIOA Local Plan: Michael Pickens / Scott Kincaid

**Approved** (Brandy Evans, Stephen Jackson, Scott Kincaid, and Michael Pickens.) There were no abstentions. There were no "nay" votes. The motion carried.

# V. Ad Hoc Committee Updates

A. Membership

No actions to report.

B. Industry Sectors Ad Hoc Committee Update

Committee members include: Cynthia (Chair), Louis, Pedro, Alena, Ethan, and Jack of the EDC.

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The committee met on March 26<sup>th</sup> and did a quantitative analysis of information from reports. The next meeting will be scheduled soon where the group will do a quantitative review and see how that affects industry ranking for WIB prioritization.

There will be two or three more meetings to complete a review of the data and then the group will be making an industry ranking recommendation to the WIB Executive Committee based on their review of the data.

- C. DEIB Ad Hoc Committee
  - There were no meetings to report on in the last month.
  - Discussed how the group may proceed with next steps. The work is largely embedded in all the work of the WIB at this point so there may be a change in the focus and how often the group meets. The committee will discuss things like training for new members or ongoing training for members as well as other potential subject as next steps and bring that information to a future Executive Committee meeting for review and approval. They will review having a trainer or facilitator come back depending on the conversation.
  - Discussed how the current political climate could affect some of the language used around this work, but not the work itself.
  - Staff will share any updates form County Counsel or County Human Resources.

# VI. Prepare for Next WIB Meetings

Items currently on the list to be included on the May agendas are the following.

- Discussion of adding a Youth Committee / Council.
- A presentation from Adult & Aging about the current and future needs of the population in our county.
- Review of the local and regional approved four-year plans.
- Grant updates and letters of support issued for initiatives in our area.
- Job Link's Business Services program.

# VII. Upcoming WIB Executive Committee Meetings and WIB Meetings

May 14, 2025 Executive Session: 2:00 pm to 2:25 pm In person / Zoom As Needed

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May 14, 2025

Full Session:

# VIII. Adjourn

2:00 pm meeting was adjourned.

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February 20, 2025

Katie Greaves Director Sonoma County Workforce Investment Board 2227 Capricorn Way, Suite 100 Santa Rosa, CA 95407

Dear Katie Greaves:

ANNUAL REVIEW 85% FORMULA GRANT FISCAL YEAR 2023-24 FINAL MONITORING REPORT

This final monitoring report is to inform you of the results of the Employment Development Department, Compliance Review Office (CRO), Workforce Innovation and Opportunity Act (WIOA), on-site monitoring review of Sonoma County Workforce Investment Board (SCWIB) fiscal and program systems for Program Year (PY) 2023-24.

Our review was conducted under the authority of WIOA, Sections 183(a) and 184(a)(4). The purpose of this review was to determine the level of compliance by SCWIB with applicable federal and state laws, regulations, policies, and directives related to the WIOA grant activities for PY 2023-24. The SCWIB was awarded WIOA funds to provide centralized comprehensive workforce services to adults, dislocated workers, youth, and rapid response. The scope of the review covered the period of July 1, 2023 through June 30, 2024.

For the review, we focused on the WIOA Adult and Dislocated Worker programs, policies and procedures, financial reporting, expenditures, cost allocation, indirect cost rate, cash management, internal controls, payroll, procurement, oversight of your subrecipients, eligibility, case management and supportive services. Additionally, we focused on the Local Workforce Development Areas (LWDA) implementation of the priority of service to veterans and eligible spouses' requirements which included a brief tour of one of the LWDAs comprehensive America's Job Center of California (AJCC).

The on-site review was conducted by Jordan Campbell, Kahnie Gaston, and Corey Pruitt from September 23, 2024 through September 27, 2024. The exit conference for this review was held on October 3, 2024. We collected the information for this report through interviews with SCWIB representatives; and by reviewing applicable policies, procedures, a sample of PY 2023-24 expenditures, and your response to the Annual Review Questionnaire.

We received your response to our draft report on December 31, 2024, and reviewed your comments and documentation before finalizing this report, and the outcomes are outlined below. Your response adequately addressed findings one, two, and three in the draft report and we consider the issues resolved and closed.

# FISCAL REVIEW RESULTS

We concluded that SCWIB did not comply with the requirements regarding the following areas: necessary and reasonable expense payments and accurate payroll reporting. The findings that we identified in these areas which require corrective action are specified below.

# FINDING ONE

## Criteria

Title 2 Code Federal Regulations (CFR), Chapter II, Part 200, Subpart D, § 200.405(a)(2) states, in part, "A cost is allocable to a Federal award or other cost objective if the cost is assignable to that Federal award or cost objective in accordance with the relative benefits received. This standard is met if the cost satisfies any of the following criteria...(2) Benefits both the Federal award and other work of the recipient or subrecipient and can be distributed in proportions that may be approximated using reasonable methods."

Title 2 CFR, Chapter II, Part 200, Subpart D, § 200.405(c) states, "A cost allocable to a particular Federal award may not be charged to other Federal awards (for example, to overcome fund deficiencies or to avoid restrictions imposed by Federal statutes, regulations, or the terms and conditions of the Federal awards). However, this prohibition would not preclude the recipient or subrecipient from shifting costs that are allowable under two or more Federal awards in accordance with existing

	Federal statutes, regulations, or the terms and conditions of the Federal awards."
	Title 2 CFR, Chapter II, Part 200, Subpart E, §200.403 states, "Except where otherwise authorized by statute, costs must meet the following criteria to be allowable under Federal awards: (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles. (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items (g) Be adequately documented. See §§ 200.300 through 200.309."
Condition	The SCWIB did not properly allocate a consultant expense payment in the amount of \$1,464 for Todd Finnemore PsyD. Consulting.
Cause	The SCWIB allocates operating costs, such as consultant services, based on a ratio of caseworker allocable time study hours. We found that based on the allocation method, one payment in the amount of \$1,464 was charged to the WIOA grant for consultant service provided by Todd Finnemore PsyD. Consulting. However, this consultant provided services for Sonoma County Human Services Department's Adult Protective Services program. Therefore, the \$1,464 is an unallowable charge to the WIOA program and has resulted in \$1,464 in questioned costs.
Corrective Action	The SCWIB must provide the CRO documentation showing that the consultant agreement expense payment of \$1,464 for Todd Finnemore PsyD. Consulting has been removed from the WIOA program and allocated to the appropriate program. Additionally, the SCWIB must provide the CRO with a Corrective Action Plan (CAP), that includes a timeline, of how it will ensure in the future that expense payments are allocated to the appropriate programs where the services were provided.
SCWIB Response	The SCWIB verified that the correct questioned amount is \$1,332.50, with \$362.00 allocated to WIOA programs, and

provided supporting documentation. The CRO reviewed the documentation and confirmed the correct amount of the
expenditure; noting that \$1,464 was a typo. Furthermore,
SCWIB's supporting documents show that only \$362 of the
\$1,332.50 was charged to WIOA programs. To address this,
SCWIB adjusted CalJOBS reports for \$225.82 and reduced the
amount of its next cash draw by \$136.18.

Finally, the SCWIB provided a CAP detailing how future expense payments will be allocated to the appropriate programs. Specifically, the SCWIB stated that "Each division accountant will check in with the County Expense Claim (CEC) accountant 30 days before the submission deadline. Each division accountant is responsible for reviewing all direct costs and letting the CEC accountant know about any adjustments needed for operating costs, like consultant services, so that the CEC is accurate and ready to be processed and submitted."

**State Conclusion** Based on the SCWIB's response, additional supporting documentation, and CAP, we have determined this finding resolved and closed.

# **FINDING TWO**

**Criteria** Title 2 CFR, Chapter II, Part 200, Subpart D, §200.302(a) states, "Each State must expend and account for the Federal award in accordance with State laws and procedures for expending and accounting for the State's funds. All recipient and subrecipient financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by the terms and conditions; and tracking expenditures to establish that funds have been used in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award. See § 200.450."

Title 2 CFR, Chapter II, Part 200, Subpart D, §200.302(b)(3) states, "The recipient's and financial management system must provide for the following...Maintaining records that sufficiently

	identify the amount, source, and expenditure of Federal funds for Federal awards. These records must contain information necessary to identify Federal awards, authorizations, financial obligations, unobligated balances, as well as assets, expenditures, income, and interest. All records must be supported by source documentation."
	Title 2 CFR, Chapter II, Part 200, Subpart E, §200.403 states, "Except where otherwise authorized by statute, costs must meet the following criteria to be allowable under Federal awards: (a) Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles. (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items (g) Be adequately documented. See §§ 200.300 through 200.309."
Condition	The SCWIB did not differentiate between administrative and program hours on their timesheets or time study reports.
Cause	The CRO sampled payroll for the pay period ending in August 2023 and April 2024. During the review, the CRO observed that the SCWIB's current time study process does not specifically categorize or track hours as administrative or program, making it unclear whether staff members worked administrative hours, program hours, or both.
Corrective Action	The SCWIB must revise its time study reports and/or timesheets to clearly differentiate between administrative and program hours. Additionally, the SCWIB must provide the CRO with a copy of the revised payroll documentation that will be used going forward to properly track the administrative hours from program hours, ensuring that these changes are consistently applied in all future payroll and time-tracking processes.
SCWIB Response	The SCWIB stated that their current time study process does separate administrative hours from program hours, and this is shown in the original supporting documentation the SCWIB sent to the CRO. The SCWIB further stated they use different codes

> to track WIOA administrative and program hours separately. In their response, the SCWIB provided code descriptions. Additionally, the SCWIB said they have "a method in place to allocate support staff costs between program and admin expenses based on ratios set by the different staffing categories for support staff." They also provided additional supporting documentation, including the "Admin/Program Staff Split," "Bridge Worksheet," and the cost pool.

**State Conclusion** Based on the SCWIB's response and additional supporting documentation, we have determined this finding resolved and closed.

# PROCUREMENT REVIEW RESULTS

We conclude that we did not identify any areas of SCWIB not meeting applicable WIOA requirements concerning procurement.

# **PROGRAM REVIEW RESULTS**

We conclude that the SCWIB did not comply with the requirements regarding the following area: completed CalJOBS entries. The finding that we identified in this area which requires corrective action is specified below:

# **FINDING THREE**

**Criteria** Title 20 CFR, Chapter V, Part 680, Subpart D §680.460(g)(1) states, "The information requirements that the Governor establishes under paragraph (f)(1) of this section must require eligible training providers to submit appropriate, accurate, and timely information for participants receiving training under WIOA title I, subtitle B. That information must include: (1) The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program."

Title 20 CFR, Chapter V, Part 678, Subpart B, §678.430(c) states, "Follow-up services must be provided, as appropriate, including: Counseling regarding the workplace, for participants in

	adult or dislocated worker workforce investment activities who are placed in unsubsidized employment, for up to 12 months after the first day of employment."	
Condition	The SCWIB staff are not entering exit notes into CalJOBS or case notes when participants leave the program, and participants are not receiving quarterly follow-up services for 12 months after exiting the program as required.	
Cause	The CRO sampled 10 Adult and Dislocated Worker case files. During the review, the CRO observed that the SCWIB staff are not properly recording the exits of participants by entering closure dates or details into CalJOBS or in case notes once the participants leave the program. The SCWIB also does not offer and/or provide follow-up services as required for all participants that have exited the program.	
Corrective Action	The SCWIB must develop a corrective action plan to ensure that participant exits are reported accurately in CalJOBS and supported by documentation such as case notes. Additionally, the corrective action plan must include how SCWIB will offer and record follow-up services in CalJOBS.	
SCWIB Response	The SCWIB developed and implemented a CAP to ensure participant exits are accurately reported in CaIJOBS with adequate supporting documentation. As part of this effort, the SCWIB introduced a "WIOA Follow-Up Policy," discussed the policy during an all-staff meeting, and retrained staff on reporting activities in CaIJOBS. Additionally, internal tracking reports were created to identify cases with pending follow-ups and cases scheduled to soft exit within 30 days. These reports are provided to case managers and supervisors.	
State Conclusion	Based on the SCWIB's acceptable CAP; we have determined that the SCWIB has adequately addressed this finding. Therefore, we consider this finding resolved and closed.	

## **TECHNICAL ASSISTANCE**

The CRO provided technical assistance during the review to address areas of noncompliance. The SCWIB was able to remedy the following items prior to the conclusion of the monitoring review:

The CRO found that the SCWIB's training timesheets were signed by participants but not dated by participants and staff, for all case files that were reviewed. Additionally, the timesheets were being edited without appropriate initials, approval and/or signatures. In response, the SCWIB notified their training providers to update their timesheets and provided additional training to staff on how to properly process timesheets when received.

The CRO found that the SCWIB was over-using applicant statements for all participants eligibility approval instead of using the applicant statements as a last resort. The SCWIB provided a special training to staff on the proper use of applicant statements.

The CRO identified that the SCWIB was registering participants under both adult and dislocated worker program codes in CalJOBS for every participant enrolled. The SCWIB trained staff on how to properly enroll participants under the program code for which they are eligible.

The CRO identified that Individual Employment Plans (IEPs) were not being completed for all participants but were entered into CaIJOBS even though they were not completed. In addition, updates to IEPs were also not consistently entered into CaIJOBS, even though this is a necessary step to maintain the IEP as a living document. The SCWIB provided training to the staff on the IEP reporting process and plans to update their IEPs.

The CRO found that for two case files, there were no verifiable documents kept in the participant case files to show that training took place. The SCWIB provided the training completion documents for the participant case files to the CRO for verification. Additionally, SCWIB provided training to their staff to ensure training completions are documented within each case file going forward.

The CRO identified that the SCWIB provided supportive services to three participants, but did not enroll the participants in a supportive service activity in CalJOBS. Additionally, some supportive services were not adequately documented and/or reported accurately in CalJOBS. The SCWIB updated their policy language regarding

supportive services and provided a special training to staff on how to properly document and report supportive services.

The CRO found that one participant case file had an occupational skills training activity entered into CalJOBS but there was no documentation supporting this activity in the case file. The SCWIB looked into this observation and found that this participant did not end up attending the training, therefore the case notes were updated to reflect this information.

The CRO identified in one case file where the participant was enrolled in staff assisted basic services in CalJOBS but the activity was not noted in the case files or case notes. The SCWIB has updated the participant's case notes to reflect the activities that took place.

The CRO found that the SCWIB did not have a process in place to identify veterans at the point-of-entry onsite for the comprehensive AJCC or on their main website. Additionally, there were no policies made available at the physical comprehensive AJCC site, and no grievance and complaint form posted as required. The SCWIB updated their main website page to clearly point individuals toward the veteran information, and the SCWIB also ensured that they updated their intake process to properly identify veterans at point-of-entry. Additionally, the SCWIB placed a binder with their policies at the physical comprehensive AJCC site.

The CRO identified that the SCWIB did not have the correct grievance and complaint information posted onsite at their comprehensive AJCC site, the SCWIB corrected the documentation and reposted the correct grievance and complaint information.

# **SUMMARY**

Because the methodology for our monitoring review included sample testing, this report is not a comprehensive assessment of all areas included in our review. It is SCWIB's responsibility to ensure that the systems, programs, and related activities comply with the WIOA grant program, federal and state regulations, and applicable state directives. Therefore, any deficiencies identified in subsequent reviews, such as an audit, would remain SCWIB responsibility.

Please extend our appreciation to your staff for their cooperation and assistance during our review. If you have any questions regarding this report or the review that was conducted, please contact Kahnie Gaston, Compliance Monitoring Analyst, at Kahnie.Gaston@edd.ca.gov or Mechelle Hayes, Compliance Monitoring Manager, at Mechelle.Hayes@edd.ca.gov.

Sincerely,

Natalie Villanueva

NATALIE VILLANUEVA, Chief Compliance Monitoring and Resolution Section Compliance Review Office

Clara Flor Vera, SCWIB CC: Carol McHale, SCWIB Diana Stone, SCWIB Teri Brimacomb **Grant Brouqua** Jordan Campbell Andrea Eich Kahnie Gaston Mechelle Haves Jennifer Gouvaia Cynthia Harrington Kimberlee Meyer **Corey Pruitt** Tim Reynaga **Charles** Tobia