

City of Springfield, Missouri

**America's Promise Grant Assessment
Report
December 16, 2019**

Contents

I.Consultant Report Letter 1

II. Executive Summary 2

III. Procedures Performed and Results 4

I. Consultant Report Letter

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We have performed certain procedures requested by the City of Springfield, Missouri (the City) with regard to an assessment of participant eligibility under the America's Promise Grant (APG) program. This report presents our findings and observations as of December 16, 2019. We placed reliance upon information provided to us for evaluation or through conversations and interviews with relevant parties. We reserve the right to supplement this report if additional information becomes available.

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II. Executive Summary

Background

The APG was awarded to the City by the U.S. Department of Labor (DOL), Employment and Training Administration in December 2016. The APG award amount was \$3 million with a period of performance of January 1, 2017 through December 31, 2020. Since March 2017, 376 participants have enrolled in the program with Ozarks Technical Community College (OTC) serving as the training facility. The APG is currently being audited as a major program in the City's Single Audit. As a result, the City of Springfield Workforce Development (WFD) staff recently evaluated the participant files and detected issues with eligibility for a significant number of participants. To help resolve those issues, the City requested that we assist in performing an assessment regarding eligibility for all participants enrolled in the APG program by WFD staff.

Scope and Procedures

We performed an assessment of eligibility for all APG participants. We were requested to perform the following scope of procedures:

1. Confirm with the Grants Manager from OTC that the population of APG participants extracted by the WFD staff is complete and accurate.
2. Obtain the eligibility requirements for participants of the APG program from WFD and City Finance staff.
3. Using the APG online applications, participant files, and related documentation maintained by WFD staff, assess whether the participants met the eligibility requirements of the APG.
4. Provide a summary of the results of the procedures, including our assessment of the completeness and accuracy of the City's original assessment of the APG population enrolled by the City's WFD staff.

Summary of Results

- We confirmed with the Grants Manager from OTC via email that the population of APG participants extracted by the WFD staff is complete and accurate. See "Confirming the Population" section below for further details.
- We obtained the eligibility requirements for APG participants by reading the Notice of Award (NOA) issued by the DOL and the America's Promise Funding Opportunity Announcement (FOA). See "Obtaining the Eligibility Requirements" section below for further details.
- We evaluated all 376 participant files at the City's Career Center and documented data necessary to complete the assessment. See "Performing the Eligibility Requirements Assessment" section below for further details.

- After completing our eligibility requirements assessment of the 376 APG participants, we concluded that 270 of the 376 APG participants were eligible for the APG program. We noted that 106 APG participants could not be classified as eligible for the APG program and should be considered exceptions. We also noted that six of the 270 eligible APG participants could only be classified as eligible after WFD obtained additional information from the six participants contemporaneously with the performance of our procedures. See “Results of the Eligibility Requirements Assessment” section below for further details.

III. Procedures Performed and Results

Confirming the Population

We received the population of APG participants from the City Attorney. The population included a total of 376 participants that were initially deemed eligible for the APG program by WFD staff. The population was provided in an electronic spreadsheet.

The Grants Manager at OTC confirmed with us via email that OTC's list of APG participants matched the population of 376 APG participants that we received from the City Attorney exactly. Therefore, it appears that the population of APG participants that we assessed is complete and accurate.

Obtaining the Eligibility Requirements

The City Attorney also provided us with the NOA, which included eligibility requirements for APG participants. The NOA referenced the FOA for further details of eligibility requirements. We also observed the application used to apply for the APG program, which is limited to individuals who reside in the counties of Christian, Dallas, Greene, Polk, Stone, Taney, and Webster (collectively the Ozarks Region). Based on the NOA, FOA and the grant application, we utilized the following criteria to assess whether an individual was eligible for the APG program:

1. The individual resides in the Ozarks Region.
2. The individual is at least 16 years old.
3. The individual is not currently enrolled in school with a local educational agency (for example, high school).
4. The individual's employment status can be categorized as one of the following:
 - a. Unemployed – an individual who does not have a job, is seeking employment, and is available for work.
 - b. Underemployed – an individual with a full-time job that is not commensurate with the individual's level of education, skills, or wage/salary earned previously. Also, an individual with episodic, short-term, or part-time employment.
 - c. Incumbent worker – an individual who is employed in a lower-skill, lower-wage, and/or front-line job and lacks the education and/or training required to obtain middle-skilled and high-skilled jobs.

Performing the Eligibility Requirements Assessment

The electronic spreadsheet containing the population of APG participants that we received had ten columns of data, including the City's original assessment of the eligibility of APG participants. The ten columns of data were as follows:

1. State ID
2. First Name
3. Last Name

4. County
5. In High School
6. Class Type
7. Campus
8. Program Start Date
9. Complete?
10. Eligibility Status

We added seven additional columns to the spreadsheet to reflect our own assessment of the population. The seven additional columns of data we added are as follows:

1. County of Residence
2. Age – At least 16
3. In High School
4. Employment Status
5. Discrepancy
6. Eligibility
7. Notes

To complete the assessment, we sent a team to the City's Career Center to evaluate the files of the 376 APG participants. Each participant file contained a copy of the completed online application along with additional supporting documentation, if necessary. For each participant file evaluated, we noted the participant's county of residence at the time of the application, whether or not the participant was at least 16 years old at the time of the application, whether or not the participant was enrolled in high school at the time of the application, and the individual's employment status at the time of the application (added columns one through four). For each participant, we also noted whether or not there was a discrepancy between our assessment and the City's original assessment (added column five), whether or not an individual should have been eligible based on our assessment of the four requirements (added column six), and added any notes we deemed necessary to include in our assessment (added column seven).

For added column four, we categorized the employment status of each APG participant as either unemployed (U), underemployed (UD), incumbent worker (I), or questionable incumbent worker (QI). For each APG participant we categorized as U, UD or I, we assessed the information found in the participant file indicated that the participant fit the definition for the applicable employment status. For each APG participant we categorized as QI, one of the following situations applied:

1. We concluded, based on the information found in the participant file, that the APG participant should be categorized as either UD or I, but were unable to determine under which of the two employment statuses the APG participant should be categorized, or
2. We were unable to determine, based on the information found in the participant file, that the APG participant should be categorized as U, UD or I.
3. We concluded, based on the information found in the participant file, that the APG participant should not be categorized as U, UD or I.

For added column five, we noted that there was a discrepancy regarding an APG participant if:

1. Our assessment of at least one of the four eligibility requirements differed from the City's original assessment, regardless if the difference impacted the overall eligibility of the participant, or
2. Our assessment of the four eligibility requirements matched the City's original assessment, but our assessment of overall eligibility differed from the City's original assessment.

Results of the Eligibility Requirements Assessment

Of the 376 APG participants assessed, we concluded that 270 APG participants were eligible for the APG program.

We concluded that 100 APG participants were not eligible for the APG program and we were uncertain of the eligibility status of six APG participants due to a lack of sufficient information. In total, there were 106 APG participants that we could not categorize as eligible for the APG program.

We noted 54 APG participants with discrepancies compared to the City's original assessment, but still eligible for the APG program. The majority of these cases were either that the APG participant was categorized under the incorrect employment status (such as being categorized as an incumbent worker when the APG participant was actually underemployed) or that the APG participant's county of residence was incorrect, but the APG participant still resided in the Ozarks Region.

We categorized 60 APG participants as having a QI employment status. The majority of these cases were because the APG participant held a full-time middle-skill/high-skilled job, such as a licensed nurse practitioner or a certified nursing assistant. Having a full-time middle skilled/high-skilled job disqualifies an individual from the APG program because the individual cannot be considered underemployed or an incumbent worker.

We categorized six APG participants as eligible for the APG program after WFD staff was able to obtain additional information from the participant contemporaneous with the performance of our procedures. Prior to WFD staff obtaining the additional information, we could not determine that these six APG participants were eligible for the APG program due to a lack of sufficient information contained in the participant files.