

**U.S. Department of Labor**

Employment and Training Administration  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210



February 11, 2020

Ms. Sally Payne  
Interim Director of Workforce Development  
Department of Workforce Development  
City of Springfield  
840 N. Boonville Avenue  
Springfield, MO 65802-3832

Dear Ms. Payne,

This letter is in regards to the America's Promise grant, HG-30126-17-60-A-29, that was awarded to City of Springfield by the U.S. Department of Labor (DOL), Employment and Training Administration (ETA). You are receiving this letter as the Authorized Representative for the grant. This is a follow up regarding City of Springfield's enrollment of several individuals who did not meet the eligibility requirements established in FOA-ETA-16-12. Subsequently, on November 25, 2019, I issued a letter to City of Springfield requesting the number of individuals enrolled in error, the total cost associated with the provision of services to these individuals and the corrective actions taken by the City of Springfield to ensure that policies and procedures are in place to avoid future errors in eligibility determination.

In your response dated December 11, 2019, you stated that 105 individuals were enrolled due to errors in the eligibility determination process and provided evidence of corrective actions steps taken, including the eligibility determination form, and policies and procedures put in place. Subsequently, on January 13, 2020, you submitted an updated response reconciling the findings from City of Springfield's internal audit and confirmed that the actual number of ineligible individuals who did not meet the eligibility criteria was 59. Your January 13, 2020 correspondence includes the following information regarding the 59 individuals:

- 53 participants did not reside in the approved service area;
- Four (4) participants were enrolled in a local educational agency;
- One (1) participant did not have required documentation to show residency in the approved service area. Several attempts to contact the individual were made; however, the participant was unable to be reached to obtain additional documentation;
- One (1) participant did not have supporting documentation to show eligibility for unemployed, underemployed, or an incumbent worker;
- The total amount of grant funds expended on the 59 individuals is \$245,511.88;

- 54 of the 59 participants have exited from the program and are no longer receiving grant funded services; and
- Five (5) of the 59 participants remain in the program and are receiving training. Ozark Technical Community College has agreed to pay the remaining training costs for these five participants and provide case management and retention services using funding sources other than the America's Promise grant.

Your FPO, Marium Baker, Gregory Scheib from the Office of Workforce Investment/Division of Strategic Investment, and myself reviewed the information and supporting documentation provided by the City of Springfield regarding the provision of services for the 59 individuals. DOL/ETA accepts City of Springfield's evidence that it has taken the necessary corrective actions to ensure that moving forward, all participants enrolled in the program meet the eligibility criteria established in FOA-ETA-16-12. As such, the DOL/ETA is issuing this one time allowance in the amount of \$245,511.88 as a remedy to allow the City of Springfield to use grant funds to cover the cost of services to the above mentioned 59 participants. In order to utilize this one time allowance, the City of Springfield must ensure that it has the appropriate receipts, invoices, case files and financial documents in place to account for the \$245,511.88 of grant used to cover the cost of services associated with the 59 participants. Please note: This one time allowance is limited and applicable only to the costs of \$245,511.88 associated with the 59 participants. All future costs associated with any additional ineligible individuals will be subject to questioned costs.

If you have any questions or need further clarification, please contact your FPO, Marium Baker, at [Baker.Marium@dol.gov](mailto:Baker.Marium@dol.gov).

We thank you and your team for the work that you all do to help America's workforce.

Sincerely,



Brinda Ruggles, Grant Officer  
Division of Federal Assistance