



**Board Finance/Audit Subcommittee**

**Meeting Agenda**

**Thursday, November 16, 2023**

**11:00 a.m. – 12:00 pm**

456 West Olive Avenue, 1st Floor, Conference Room #174 (Spruce Room), Sunnyvale, CA

Meeting packet is also posted on the NOVAworks website: <https://novaworks.org/>.

***Subcommittee Charter:***

With the ongoing volatility of federal WIOA funding, the Finance/Audit Subcommittee of the Executive Committee was formed to review the organization's financial statements to ensure fiscal accountability and make recommendations, as appropriate, to ensure the sound fiscal health and sustainability of the organization.

- I. Welcome and Review Agenda** (Chair, Stacey Porter) (5 minutes)
- II. Review November 1, 2022, Meeting Minutes (enclosure)** (Chair, Stacey Porter) (5 minutes)
- III. Expenditures** (Committee) (25 minutes)
  - a. Review PY22 Year-End Financial Statement (enclosure)**
  - b. Review Q1 PY23 Financial Statement (enclosure)**
- IV. Compliance**
  - a. Review of Monitoring Reports for NOVAworks (enclosures)** (Committee) (20 minutes)
- V. Wrap-up & Next Steps: Report-out at November 29 Board Meeting** (Stacey) (5 minutes)



Board Finance/Audit Subcommittee  
November 1, 2022 Meeting  
Draft Meeting Minutes

Finance/Audit Subcommittee members present: E. Hamilton, S. Levy, and A. Manwani

NOVA Staff: M. Sessions, G. Pham

**I. Review Agenda and November 8, 2021 Meeting Minutes**

The Finance/Audit Subcommittee reviewed the agenda and meeting minutes from the November 8, 2021 meeting.

**II. Expenditures**

The Committee reviewed the financial statements and audit and monitoring reports for the past year.

- For Program Year (PY) 2021 Year-End Financial Statement, available funding for NOVAworks was \$12.416 million, with spending to date at \$7.339 million, and leaving a balance of funds of \$5.077 million.

**III. Updates NOVAworks Foundation**

The Committee reviewed the PY 2021 Year-End NOVAworks Foundation funding, with \$1.144 million available, spending to date at \$22,620, and leaving a balance of funds of \$1.122 million.

**IV. Compliance**

Every year, NOVAworks staff has effectively managed multiple funding sources and achieved WIOA performance goals and goals specific to each individual grant. In addition to WIOA formula funding, staff managed funding from 10 different grants from federal, state, and local governments and three different grants on behalf of its regional partners.

- Audit and monitoring reports were reviewed with no significant findings. This included the City of Sunnyvale Single Audit Report for NOVAworks and Workforce Innovation and Opportunity Act (WIOA) Section 188 Nondiscrimination and Equal Opportunity Provisions Annual Compliance Monitoring Review Final Report PY 2021-22.

**V. Wrap-up & Next Steps**

The Committee chairperson will be reporting out on the Finance/Audit Subcommittee meeting at the November 30, 2022, Board meeting. The Committee will recommend the Board accepts PY2021 Year-End Financial Statement.

NOVA Grant Status Report									
For the Period from July 1, 2022 through June 30, 2023									
Source	Title	Period of Performance		Carry In Funds	PY22 Funds	Total Available	PTD Spend Actual	Year End	
		From	To					Remaining Balance	Balance
WIOA	Adult	07/21	06/23	200,804	1,503,060	1,703,864	1,701,794	2,071	2,071
WIOA	Dislocated Worker	07/21	06/23	418,390	2,148,498	2,566,888	2,071,171	495,717	495,717
WIOA	Youth	04/21	06/23	405,912	1,496,149	1,902,061	911,011	991,049	991,049
WIOA	Rapid Response	07/21	06/22	12,664	1,749,315	1,761,979	1,298,756	463,223	463,223
WIOA	RR Layoff Aversion	07/21	06/22	15,918	514,634	530,552	401,945	128,607	128,607
	<i>Allocation Subtotal</i>			1,053,688	7,411,656	8,465,344	6,384,677	2,080,667	2,080,667
WIOA	25% Additional Assistance - Reemployment & Equity	07/21	09/22	160,488	-	160,488	160,488	-	-
State NDWG	Employment Recovery NDWG	04/20	03/23	159,705	-	159,705	159,705	-	-
DOL NDWG	CAREER DWG	08/21	08/24	2,684,415	-	2,684,415	1,619,610	1,064,805	1,064,805
SMC ARPA	San Mateo County ARPA Workforce Pilot Program	03/22	10/22	309,084	-	309,084	309,084	-	-
SCC	Santa Clara County Whole Person Pilot	07/22	06/23	-	250,000	250,000	250,000	-	-
CEC	Prospect Silicon Valley - Berkely Unified School Dist	03/22	07/23	11,316	-	11,316	6,336	4,980	4,980
CEC	Prospect Silicon Valley - Twin Rivers Unified School	03/22	07/23	11,408	-	11,408	7,157	4,251	4,251
	<i>NOVA Subtotal (includes Allocation subtotal)</i>			4,390,104	7,661,656	12,051,760	8,897,057	3,154,703	3,154,703
	RPU Funding - NOVA Allotment only								
RPU / WIOA	RPI 4.0 Advanced Equity thru Skills Based Hiring	04/21	09/22	95,660	-	95,660	95,660	-	-
RPU	Regional Equity and Recovery Partnerships	04/21	09/22	-	800,000.00	800,000	952	799,048	799,048
	<i>RPU Subtotal</i>					895,660	96,612	799,048	799,048
	<b>TOTAL</b>					12,947,420	8,993,669	3,953,751	3,953,751
	<b>NOVA Foundation</b>			1,121,630	108,840	1,230,470	13,077	1,217,393	1,217,393

## NOVA Grant Status Report

For the Period from July 1, 2023 through October 31, 2023

Source	Title	Period of Performance From	To	Total Available	PTD Spend Actual	Remaining Balance
WIOA	Adult - PY22	07/22	06/24	1,503,060	1,503,060	-
WIOA	Adult - PY23	07/23	06/25	1,264,179	397,205	866,974
WIOA	Dislocated Worker - PY22	07/22	06/24	2,148,498	2,148,498	-
WIOA	Dislocated Worker - PY23	07/23	06/25	2,026,871	34,798	1,992,073
WIOA	Youth - PY22	04/22	06/24	1,496,149	552,457	943,692
WIOA	Youth - PY23	04/23	06/25	1,246,037	-	1,246,037
WIOA	Rapid Response - PY22	07/22	06/23	1,749,315	1,749,315	-
WIOA	Rapid Response - PY23	07/23	06/24	2,806,668	303,806	2,502,862
WIOA	RR Layoff Aversion - PY22	07/22	06/23	514,634	514,634	-
WIOA	RR Layoff Aversion - PY23	07/23	06/24	503,398	47,164	456,234
	<i>Allocation Subtotal</i>			<b>15,258,809</b>	<b>7,250,936</b>	<b>8,007,873</b>
DOL NDWG	CAREER DWG	08/21	08/24	3,000,000	2,075,749	924,251
	<i>NOVA Subtotal (includes Allocation subtotal)</i>			<b>18,258,809</b>	<b>9,326,685</b>	<b>8,932,124</b>
RPU	RPU Funding - NOVA Allotment only					
	Regional Equity and Recovery Partnerships	12/22	09/25	800,000	952	799,048
	<i>RPU Subtotal</i>			<b>800,000</b>	<b>952</b>	<b>799,048</b>
	<b>TOTAL</b>			<b>19,058,809</b>	<b>9,327,637</b>	<b>9,731,172</b>
	<b>NOVA Foundation</b>			<b>1,121,655</b>	<b>794</b>	<b>1,120,861</b>



February 1, 2023

Marlena Sessions  
Director  
North Santa Clara Valley Job Training Consortium  
505 West Olive Avenue, Suite 550  
Sunnyvale, CA 94086

Dear Marlena Sessions:

**FISCAL REVIEW  
85% FORMULA GRANT  
FISCAL YEAR 2021-22 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), Enhanced Desk Monitoring Review (EDMR) of the North Santa Clara Valley Job Training Consortium's (NOVA)'s fiscal systems for Program Year (PY) 2021-22.

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 NOVA with applicable federal and state laws, regulations, policies, and directives related to the WIOA grant, specific to financial management activities for PY 2021-22. NOVA 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, 2021 through June 30, 2022.

For the fiscal portion of the review, we focused on the following areas: fiscal policies and procedures, financial reporting, expenditures charged to the WIOA grants, cost allocation, indirect cost rate, cash management, internal controls, and oversight of your subrecipients, audits, and debt collection.

The EDMR review was conducted by Daniel Jordan from January 9, 2023 through January 13, 2023. The exit conference for this review was held on January 17, 2023.

Marlena Sessions  
February 1, 2023  
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We collected the information for this report through interviews with NOVA representatives; and by reviewing applicable policies, procedures, a sample of PY 2021-22 expenditures, and your response to the Fiscal Monitoring Questionnaire.

### **FISCAL REVIEW RESULTS**

We conclude that we did not identify any areas of NOVA not meeting WIOA requirements concerning financial management.

### **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 NOVA'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 NOVA's 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 Daniel Jordan, Compliance Monitoring Analyst, at [Daniel.Jordan@edd.ca.gov](mailto:Daniel.Jordan@edd.ca.gov) or Karen Fuller-Ware, Compliance Monitoring Supervisor, at [Karen.Fuller-Ware@edd.ca.gov](mailto:Karen.Fuller-Ware@edd.ca.gov).

Sincerely,

*C Harrington*

CINDY HARRINGTON, Office Chief  
Compliance Monitoring and Resolution Section  
Compliance Review Office

cc: See Attached Distribution List

Distribution List

Giang Pham, NOVA  
Ann Brito  
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June 27, 2023

Marlena Sessions, Director  
NOVA  
456 W Olive Ave  
Sunnyvale, CA 94086

Dear Marlena Sessions:

**WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) SECTION 188  
NONDISCRIMINATION AND EQUAL OPPORTUNITY PROVISIONS  
ANNUAL COMPLIANCE MONITORING REVIEW  
FINAL REPORT PROGRAM YEAR (PY) 2022-23**

This notification informs you of the results of the Employment Development Department's (EDD) Equal Employment Opportunity (EEO) on-site compliance monitoring review of NOVA for compliance to the WIOA Section 188 for PY 2022-23. This review was conducted by Zachary Sergio, EEO Specialist on May 2, 2023.

Our review was conducted under the authority of WIOA Section 188 and its implementing regulation Title 29 Code of Federal Regulations Part 38. The purpose of this review was to determine the level of compliance by NOVA with applicable federal and state laws, regulations, policies, and directives related to the WIOA grant regarding nondiscrimination and equal opportunity provisions for PY 2022-23.

We collected the information for this report through a desk review of documents submitted by NOVA, the completed EDD's EEO Office Compliance Monitoring Guide completed by your Equal Opportunity (EO) Officer, interviews with NOVA representatives, and a review of applicable policies and procedures.

**COMPLIANCE MONITORING REVIEW RESULTS**

We conclude that, overall, NOVA is meeting applicable WIOA Section 188 requirements concerning nondiscrimination and equal opportunity provisions.

This report contains no findings or conditions; therefore, we are issuing this report as the final report.



Marlena Sessions  
June 27, 2023  
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Because the methodology for our monitoring review included sample testing, this report is not a comprehensive assessment of all of the areas included in our review. It is NOVA's responsibility to ensure that its systems, programs, and related activities comply with the WIOA grant program, federal and state regulations, and applicable state directives. Consequently, any deficiencies identified in subsequent reviews, such as an audit, would remain the NOVA's 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 Zachary Sergio at [Zachary.Sergio@edd.ca.gov](mailto:Zachary.Sergio@edd.ca.gov) or Kimberly Clinton, EEO Office Manager, at [Kimberly.Clinton@edd.ca.gov](mailto:Kimberly.Clinton@edd.ca.gov).

Sincerely,

/s/ MATILDA AIDAM  
State-level EO Officer

cc: Teri Brimacomb, Workforce Services Branch, MIC 50  
Giang Pham, NOVA Consortium EO Officer

**U.S. Department of Labor**

Employment and Training Administration  
San Francisco Regional Office  
90 7<sup>th</sup> Street, Suite 17300  
San Francisco, California 94103



September 28, 2023

Marlena Sessions  
Executive Director  
NOVAworks  
456 W. Olive Avenue  
Sunnyvale, CA 94086

Grant No: DW-36841

Dear Ms. Sessions:

During the period of July 10-14, 2023, the U.S. Department of Labor, Employment and Training Administration (ETA), conducted an on-site review of your organization's Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) National Dislocated Worker Grant (NDWG). The exit conference was held remotely on July 21, 2023.

The enclosed report outlines the scope of the review and identifies one compliance finding, two areas of concern, and three promising practices. Please respond to the report within 30 days of receipt to the Regional Office at [R06-RA-SF@dol.gov](mailto:R06-RA-SF@dol.gov) with a copy to your Federal Project Officer, Latha Seshadri, at [Seshadri.latha@dol.gov](mailto:Seshadri.latha@dol.gov). Your response should include corrective actions taken to resolve the findings and any planned actions with timelines.

I hope that our review was helpful to you and your team. Please express my gratitude to your staff for their assistance in the review. If you have any questions, please contact Ms. Seshadri at (415) 625-7937 or me at (415) 625-7900.

Sincerely,

Dr. Tamika L. Ledbetter  
Regional Administrator

Enclosure

## EXECUTIVE SUMMARY

The review resulted in one compliance finding and two areas of concern.

### **Finding:**

Finding #1: Non-compliance with the Stevens Amendment

### **Areas of Concern:**

Area of Concern #1: Subrecipient Not Providing Supportive Services

Area of Concern #2: Inaccurate Subrecipient Case Notations

### **Promising Practices:**

Promising Practice #1: Innovative NOVAworks MyPlan Tool

Promising Practice #2: Digital Literacy Training for Job Seekers

Promising Practice #3: Nontraditional Partnerships

Please note that the review did not cover any areas outside the defined scope. Although no material issues came to the reviewers' attention other than those contained in this report, there is no assurance that other issues may not exist.

## SCOPE OF REVIEW

### **Dates of Review:**

July 10-14, 2023

### **Sites Visited:**

- NOVAworks
- Work2future
- San Francisco Office of Economic and Workforce Development (SF OEWD)

### **Purpose of Review:**

The purpose of the review was to determine if the grant program is operating in compliance with all applicable Federal laws, regulations, policies, and other grant requirements and to identify promising practices and opportunities for technical assistance.

### **Programs Reviewed:**

Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) National Dislocated Worker Grant (NDWG)

### **Time Period for Review:**

8/20/2021 - 6/30/2023

### **Date of Exit Conference:**

July 21, 2023

**Tools Used for Review:**

- ETA Core Monitoring Guide (2018)
- NDWG Supplement to the Core Monitoring Guide (April 2021)

**ETA Reviewers:**

- Latha Seshadri, Federal Project Officer
- Violet Jackson, Federal Project Officer
- Sayeda Hasan, Student Intern

**Attendees at Exit Conference:**

ETA

- Latha Seshadri, Federal Project Officer
- Violet Jackson, Federal Project Officer
- Sayeda Hasan, Intern

NOVAworks

- Marlana Sessions, Executive Director
- Giang Pham, Business Operations Manager

**BACKGROUND**

**Period of Performance:** 8/20/2021 - 8/19/2024

**Award Amount:** \$3,000,000

The CAREER grant is a collaboration of three workforce development boards. The purpose of the grants is to provide intensive career services to individuals from historically excluded communities through innovative partnerships with libraries and industry associations. Their effort also has included large-scale hospitality and small business hiring fairs, digital literacy programs, and technical enhancements to NOVAworks' MyPlan remote career navigation platform.

**Performance and Financial Analysis:**

As shown in the table below, NOVAworks has expended 53 percent of the total award and achieved 82 percent of enrollments. The lower than anticipated expenditures are due to lower training costs; NOVAworks and its subrecipients are providing supportive services through other grant funds, which has contributed to lower than anticipated expenditure levels.

NOVAworks received a period of performance extension until August 19, 2024, on August 4, 2023. They anticipate expending the funds as the needs of participants and training costs have been increasing.

	Planned Total	Actual as of 6/30/2023	% of Goal
Enrollments	600	490	82%
Expenditures	\$3,000,000	\$1,587,375	53%

## FINDING

### **Finding #1: Non-compliance with the Stevens Amendment**

#### **Indicator:** 1.b.2 Participant Recruitment Activities

A statement acknowledging the use of Federal funds is not included in all publicly distributed outreach and recruitment materials. As a result, the public is denied the opportunity to gain awareness of the amount and percentage of Federal funding invested in the grant program. This occurred due to a lack of sub-recipient training for the staff creating the outreach materials.

The Stevens Amendment (P.L. 115-141, Division H, Title V, Section 505), as reiterated in the Grant Agreement, Section 15, Fiscal Year 2018 Federal Appropriations Requirements, Page 27, requires:

*When issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with Federal money, all grantees receiving Federal funds included in this Act, including but not limited to state and local governments and recipients of Federal research grants, shall clearly state -*

- (1) The percentage of the total costs of the program or project which will be financed with Federal money;*
- (2) The dollar amount of Federal funds for the project or program; and*
- (3) The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.*

**Corrective Action:** To resolve this finding, NOVAworks and its sub-recipients must correct the publicly distributed outreach and recruitment materials so that they are aligned with the Stevens Amendment requirements and verify that the funding statement is in all of their public-facing materials. NOVAworks must provide revised outreach material with Stevens Amendment language for NOVAworks and its sub-recipients to the Regional Office.

## AREAS OF CONCERN

### **Area of Concern #1: Subrecipient Not Providing Supportive Services**

NOVAworks is providing supportive services with grant funds and other non-Federal grant funds. However, their sub-recipients, work2future/San Jose Career Center and SF OEWD, are not providing supportive services. Both of the work2future and SF OEWD project managers indicated that participants, “did not want supportive services.” Both operators have a supportive services policy in place and project plan and grant budget to provide supportive services.

Technical assistance was provided to the grantee by the FPO; supportive services are an allowable activity within the grant and may be necessary to enable an individual to participate in the activities, particularly considering that they are serving historically excluded communities.

**Recommended Action:** In instances where the supportive services are provided with other grant funds, the grantee should report that in the Quarterly 9130 Financial Report as a leveraged resource and in the Quarterly Narrative Report submitted through the Workforce Integrated Performance System (WIPS). Additionally, NOVAworks should ensure that their subrecipients have trained their staff in the supportive services policy.

#### **Area of Concern #2: Inaccurate Subrecipient Case Notations**

Review of Case File #4064135 (Cheng, S C) indicated that the participant had received supportive services and case file notation indicate that the supportive services were paid for with CAREER grant funds. Conversations with the NOVAworks project manager and the SF OEWD project manager revealed that all supportive services were paid for with non-Federal grant funds.

**Recommended Action:** SF OEWD should update the case file notation that the supportive services for this participant were paid with non-Federal funds and provide proof of the update to NOVAworks. Further, NOVAworks should ensure that their subrecipients are trained in case record policies.

### **PROMISING PRACTICES**

#### **Promising Practice #1: Innovative NOVAworks MyPlan Tool**

The innovative NOVAworks' MyPlan tool provides job seekers with access to core curriculum including information, resources, videos, and handouts. The site walks job seekers through the four phases of a job search: Focus, Resume, Job Search, and Interviewing.

- Focus – enables customers to know who they are and what they want to do.
- Resume – provides customers an opportunity to demonstrate how their skills and abilities make them the best candidate for the position.
- Job search – is an ongoing process of identifying job leads, networking, and applying for positions. It walks the customer through key strategies that could help them to get back to work faster.
- Interviewing - the interview is a conversation between the customer and the employer. While the employer is indeed making a judgment as to whether a candidate is right for the job, the candidate needs to determine if this a right fit for them, as well.

The CAREER grant funding has enabled NOVAworks to add and implement new features as requested by customers. The participant we interviewed indicated that they found the MyPlan platform very helpful in tracking where they are in job search and what their next action steps are.

#### **Promising Practice #2: Digital Literacy Training for Job Seekers**

NOVAworks has developed a curriculum to provide basic digital literacy training to job seekers. They have taken an iterative approach to curriculum development and continue to adjust after

each cohort, based on customer feedback. An example of this is that the first cohort was a two-week program. Based on customer input, they revised the curriculum to a one-week program, making it easier for customers to attend all classes. The content includes an initial skills assessment, security and privacy training, Gmail, Google Drive, Google Suite, and Zoom training, and a final assessment. NOVAworks offers these classes in person, and each section of the training has instruction and hand-on practice activities.

**Promising Practice #3: Nontraditional Partnerships**

NOVAworks has sought to foster a variety of partnerships benefitting local jobseekers by leveraging prospective employment opportunities from neighboring organizations and entities. In doing so, it has, in effect, created a pipeline to funnel individual jobseekers into career fields and training pathways that had not existed for them prior to the implementation of these programs. Such examples include NOVAworks' partnership with Stanford Medicine to train former food service staff into long-term healthcare professional roles. Such opportunities have increased jobseekers' ability to attain stable, high-quality employment within regionally in-demand industry sectors.



October 27, 2023

- A Slice of New York
- Biocom California
- Carobar Business Solutions
- California Department of Rehabilitation
- California Employment Development Dept
- Center for Continuing Study of the California Economy
- Code Name Collective
- Manpower Group
- Outset Medical
- Pipe Trades Training Center
- PROCEPT BioRobotics
- Sacred Heart Community Service
- San Mateo County Central Labor Council
- San Mateo County Economic Development Association
- Santa Clara Adult Education
- Santa Clara and San Benito Counties Building & Construction Trades Council
- Santa Clara County Housing Authority
- South Bay Labor Council
- THL
- Vander-Bend Manufacturing
- Watershed

Co-Chairs:  
Jennifer Morrill  
Andy Switky

Vice Chair:  
Rosanne Foust

Director:  
Marlena Sessions

Dr. Tamika L. Ledbetter  
Regional Administrator  
U.S. Department of Labor  
Employment and Training Administration  
San Francisco Regional Office  
90 7<sup>th</sup> Street, Suite 17300  
San Francisco, CA 94103

Dear Dr. Ledbetter,

NOVAworks respectfully submits its response to the on-site review of its Comprehensive and Accessible Reemployment through Equitable Employment Recovery (CAREER) National Dislocated Worker Grant (NDWG) conducted in July of 2023. We have thoroughly reviewed the letter issued to us on September 28, 2023, and agree with the finding and two areas of concern observed during the review. NOVAworks has since corrected the noted issues and has taken further steps to prevent future, related issues.

**Finding #1: Non-compliance with Stevens Amendment**

**Corrective Action Taken:** NOVAworks corrected all publicly distributed outreach and recruitment materials so that they are now aligned with the Stevens Amendment requirements, verifying that the funding statement is in all our public-facing materials. Revised outreach materials with the required Stevens Amendment language will be provided to the Regional Office for review.

**Area of Concern #1: Subrecipient Not Providing Supportive Services**

**Corrective Action Taken:** NOVAworks has discussed the issue with its subrecipients and confirmed that the subrecipient noted, SFOEWD, provided supportive services. The supportive services provided were funded via other funding streams and programs, however, and SFOEWD was instructed to report such expenditures as leveraged resources in the Quarterly 9130 Financial Report and in the Quarterly Narrative Reports. Furthermore, NOVAworks also ensured that its subrecipients have trained their staff in their corresponding supportive services policies.

**Area of Concern #2: Inaccurate Subrecipient Case Notations**

**Corrective Action Taken:** NOVAworks asked that the subrecipient noted, SFOEWD, update the case file notation to show that the supportive services were paid for by non-Federal funds. Furthermore, NOVAworks ensured that the subrecipient is trained in case record policies.

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NOVAworks is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.



NOVAworks would like to thank the Department of Labor staff that were assigned to our program and conducted the review with regard to their courtesy and professionalism during their on-site visit and subsequent, remotely-held exit conference.

Sincerely,

A handwritten signature in blue ink that reads "Marlena Sessions". The signature is written in a cursive, flowing style.

Marlena Sessions  
Executive Director