



The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

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NO. 2010-0003-3R

**INDEPENDENT STATE AUDITOR'S REPORT ON
CERTAIN ACTIVITIES OF THE
EXECUTIVE OFFICE OF LABOR AND
WORKFORCE DEVELOPMENT
FOR THE PERIOD ENDING SEPTEMBER 30, 2009**

**OFFICIAL AUDIT
REPORT
JANUARY 18, 2011**

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The Executive Office of Labor and Workforce Development (EOLWD) is authorized by Chapter 23, Section 1, of the Massachusetts General Laws and operates under the supervision and control of the Secretary of Labor and Workforce Development, who is appointed by the Governor. The mission of EOLWD is to enhance the quality, diversity, and stability of the Commonwealth's workforce by making available new opportunities and training, protecting the rights of workers, preventing workplace injuries and illnesses, ensuring that businesses are informed of all employment laws impacting them and their employees, providing temporary assistance when employment is interrupted, promoting labor-management partnerships, and ensuring equal access to economic self-sufficiency and opportunity for all citizens of the Commonwealth.

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted an audit of certain activities of EOLWD's 2009 Summer Jobs & Youth Program. The objectives of our audit were to assess the implementation and compliance with summer youth employment opportunities under the Workforce Investment Act of 1998 (WIA) that is administered by EOLWD and its various agencies.

Our audit scope was limited to federal stimulus funds that EOLWD received for the Summer Jobs & Youth Program under the American Recovery and Reinvestment Act of 2009 (ARRA). Funding for the program under ARRA was distributed to EOLWD from the United States Department of Labor. EOLWD was awarded \$21.1 million in ARRA funds through the WIA Title I Youth funding stream and an additional \$3.1 million in public safety funds through the United States Department of Justice Edward Byrne Memorial Justice Assistance Grant (JAG) Program. This audit report is a compilation of three separate audit reports released in conjunction with our site visits of the South Coastal Career Centers (Audit No. 2010-0003-3R2), Career Center of Lowell (Audit No. 2010-0003-3R1), and Brockton Area Workforce Investment Board (2010-0003-3R3), all dated June 16, 2010.

Based on our review, we concluded that, except for the issue addressed in the Audit Results section of this report, during the three-month period ending September 30, 2009, EOLWD maintained adequate management controls and complied with applicable laws, rules, and regulations for the areas tested pertaining to the Summer Jobs & Youth Program.

AUDIT RESULTS

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IMPROVEMENTS NEEDED OVER THE MONITORING OF THE NUMBER OF PARTICIPANTS REPORTED AND LEVELS AT WHICH THEY PARTICIPATE IN THE SUMMER YOUTH JOBS PROGRAM

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Our review determined, through site visits at South Coastal Career Centers, Career Center of Lowell, and the Brockton Area Workforce Investment Board, that the number of qualified participants for the Summer Jobs & Youth Program was 753. However, 39 of these qualified participants never reported for training or to his/her assigned worksite. Based upon our

review of records provided to us and conversations with representatives at these selected Workforce Investment Boards (WIB), these 39 youths, or 5.2%, were included in the 6,908 youths that participated in the overall 2009 Summer Jobs & Youth Program reported by EOLWD. We ascertained through interviews with management at the three WIBs that this discrepancy is a systematic problem with the use of the Massachusetts One-Stop Employment System (MOSES). MOSES does not allow for any sort of modification to the reported number of enrollees. Once in-take information is entered into the system on a qualified participant, the individual is counted as a participant, regardless of their level of participation.

In addition to verifying the number of participants that were properly enrolled in the program, the OSA also reviewed payroll records supplied to determine the level of participation of the youths selected for the program. Of the 714 confirmed participants, 72 enrollees, or approximately 10%, had participated less than 50 hours in the designated 25-hour per week, six-week program. Since these enrollees did not participate in two-thirds of the program, we question whether they should have been reported as participants in the program.

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INTRODUCTION

Background

The \$787 billion American Recovery and Reinvestment Act of 2009 (ARRA) is an economic stimulus package enacted by the 111th United States Congress in February 2009. ARRA was based largely on proposals made by President Barack Obama and was intended to provide a stimulus to the U.S. economy in the wake of the economic downturn. ARRA includes federal tax cuts, expansion of unemployment benefits, and other social welfare provisions and domestic spending in education, health care, and infrastructure. ARRA was enacted with the goal of preserving and creating jobs in the short-term, while also investing in transportation, education, alternative energy, environmental protection, and other key infrastructure projects that will provide long-term economic benefits. ARRA also seeks to help Americans hurt by this global economic collapse.

The Executive Office of Labor and Workforce Development (EOLWD) is authorized by Chapter 23, Section 1, of the General Laws and operates under the supervision and control of the Secretary of Labor and Workforce Development, who is appointed by the Governor. The mission of EOLWD is to enhance the quality, diversity, and stability of the Commonwealth's workforce by making available new opportunities and training, protecting the rights of workers, preventing workplace injuries and illnesses, ensuring that businesses are informed of all employment laws impacting them and their employees, providing temporary assistance when employment is interrupted, promoting labor-management partnerships, and ensuring equal access to economic self-sufficiency and opportunity for all citizens of the Commonwealth. The current agencies under the direction of the Secretary of Labor and Workforce Development within EOLWD are: Department of Industrial Accidents; Department of Labor; Department of Workforce Development; Division of Apprentice Training; Division of Career Services; Division of Labor Relations; Division of Occupational Safety; Division of Unemployment Assistance; Massachusetts Workforce Investment Board; Commonwealth Corporation Board of Review; Joint Task Force on The Underground Economy and Employee Misclassification; and Workers' Compensation Advisory Council. Through ARRA, EOLWD received over \$24 million to supplement its ongoing Summer Jobs & Youth Program.

Audit Scope, Objectives, and Methodology

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted an audit of EOLWD's Summer Jobs & Youth Program. The objectives of our audit were to assess the implementation and compliance with summer youth employment opportunities under the Workforce Investment Act of 1998 (WIA) administered by EOLWD and its various agencies.

Our audit scope was limited to ARRA funds that EOLWD received to supplement the Summer Jobs & Youth Program under WIA. Funding for the Summer Jobs & Youth Program through ARRA was distributed to EOLWD from the United States Department of Labor (DOL). EOLWD was awarded \$21.1 million in recovery funds through the WIA Title I Youth funding stream and an additional \$3.1 million in public safety funds through the United States Department of Justice Edward Byrne Memorial Justice Assistance Grant (JAG) Program.

The primary purpose of the WIA is to provide the framework for a unique national workforce preparation and employment system designed to meet both the needs of the nation's businesses and the needs of job seekers and those who want to further their careers. A key component of WIA is that eligible youth must be low-income, ages 14 through 21 (increased to 24 under ARRA), although up to five percent who are not low-income may receive services if they face certain barriers to school completion or employment as prescribed by WIA Section 129(c)(5). Participants in the Summer Youth Jobs Program also must face one or more of the following challenges to successful workforce entry: (1) school dropout; (2) basic literacy skills deficiency; (3) homeless, runaway, or foster child; (4) pregnant or a parent; (5) an offender; or (6) need help completing an educational program or securing and holding a job. Youths will be prepared for postsecondary educational opportunities or employment. Programs will link academic and occupational learning. Service providers will have strong ties to employers. Programs must also include tutoring, study skills training, and instruction leading to completion of secondary school (including dropout prevention); alternative school services; mentoring by appropriate adults; paid and unpaid work experience (such as internships and job shadowing); occupational skills training; leadership development; and appropriate supportive services.

The ARRA funds were distributed by the DOL to serve young people in 16 local workforce investment areas with a strong emphasis to stimulate the economy immediately. The allocation of these funds to each Workforce Investment Board is as follows:

<u>Entity</u>	<u>Amount of Grant</u>
Berkshire Training & Employment Program	\$ 320,456
Metro Southwest Reg. Employment Board	751,599
South Coastal Career Development Administration	1,055,446
Greater New Bedford Workforce Invest. Board	1,557,344
Reg. Employment Board Hampden/Springfield	2,562,282
Job Training & Employment Corporation of Hyannis	779,197
Employment Links, Inc Leominster	969,219
Career Center of Lowell	838,160
City of Lawrence	1,477,863
Economic Development and Industrial Corp/Boston	2,541,925
City of Fall River/Bristol County	2,131,348
Metro North Regional Employment Board/Cambridge	1,384,969
North Shore Workforce Investment Board/ Salem	1,018,740
City of Worcester	1,952,478
Brockton Area Private Industrial Council	878,918
Franklin Hampshire Employment & Training	<u>892,388</u>
Total	<u>\$21,112,332</u>

The purpose of these funds is intended to provide summer employment opportunities and training activities for low-income youths between the ages of 14 to 24 with certain prescribed barriers to employment as delineated by the policies and procedures issued by the DOL and further enumerated by EOLWD.

The Office of the State Auditor (OSA) selected three Workforce Investment Boards (WIBs) to visit and examine in order to monitor compliance with all applicable laws, rules, and regulations issued by DOL and EOLWD governing the distribution of ARRA funds to support summer employment opportunities.

This audit report is a compilation of three separate audit reports released in conjunction with our site visits of the South Coastal Career Centers (Audit No. 2010-0003-3R2), Career Center of Lowell (Audit No. 2010-0003-3R1), and Brockton Area Workforce Investment Board (2010-0003-3R3), all dated June 16, 2010. The purpose of this report is to provide the results of our review of the eligibility requirements of the participants that were enrolled in the ARRA Summer Youth Jobs

program for the period ending September 30, 2009 at these selected WIBs and to verify the accuracy of the number of participants and their level of participation as reported by each WIB through EOLWD.

Our audit fieldwork was conducted in accordance with generally accepted government standards for performance audits and accordingly, included such audit tests and procedures as we considered necessary. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the data and evidence obtained provided us with a reasonable basis for our findings and conclusions based on our audit objectives. To achieve our audit objectives, our review included:

- Analyzing all applicable laws, rules, and regulations pertaining to the WIA Title I Youth ARRA funding stream,
- Interviewing management and staff of WIBs to assess the level of internal control over their oversight of the Summer Youth Jobs Program,
- Reviewing the Awards Letter received by the WIB to verify the amount of funds received and the purpose of the funding,
- Reviewing participant files to verify compliance with the DOL and EOLWD guidelines on eligibility requirements and income verification,
- Reviewing payroll records at the WIB to determine the level of participation by qualified participants, and
- Reviewing the process and procedures established by EOLWD by which the WIB entered data on certified participants in its Summer Youth Jobs Program into the Massachusetts One-Stop Employment System (MOSES).

AUDIT RESULTS

IMPROVEMENTS NEEDED OVER THE MONITORING OF THE NUMBER OF PARTICIPANTS REPORTED AND LEVELS AT WHICH THEY PARTICIPATE IN THE SUMMER YOUTH JOBS PROGRAM

Our review determined, through site visits at South Coastal Career Centers (SCCC), Career Center of Lowell (CCL), and the Brockton Area Workforce Investment Board (BAWIB), that the number of qualified participants for the Summer Jobs & Youth Program was 753. However, 39 of these eligible youths never reported for training or to his/her assigned worksite. Based upon our review of records provided to us and conversations with representatives at these selected Workforce Investment Boards (WIB), these 39 youths, or 5.2%, were included in 6,908 youths that participated in the overall 2009 Summer Jobs & Youth Program reported by EOLWD. We ascertained through interviews with management at the three WIBs that this discrepancy is a systematic problem with the use of the Massachusetts One-Stop Employment System (MOSES). MOSES does not allow for any sort of modification to the reported number of enrollees. Once in-take information is entered into the system on a qualified participant, the individual is counted as a participant, regardless of their level of participation. In addition to verifying the number of participants that were properly enrolled in the program, the Office of the State Auditor (OSA) also reviewed payroll records supplied to determine the level of participation of the youths selected for the program. Of the 714 confirmed participants, 72 enrollees, or approximately 10%, had participated less than 50 hours in the designated 25-hour per week, six-week program. Since these enrollees did not participate in two-thirds of the program, we question whether these enrollees should have been reported as participants in the program. EOLWD needs to improve its monitoring not only to ensure that only qualified individuals are enrolled, but also to ensure their actual participation in the program.

Participants and Eligibility Criteria

Although a significant number of the youths that filed applications for consideration in the program may have met the income eligibility criteria set forth under the Workforce Investment Act of 1998 (WIA), they were disqualified from participating in this program because they could not meet or document any of the additional eligibility criteria required by the United States Department of Labor (DOL). Individuals between the ages of 14 and 24 who are low-income and meet one or more of the following criteria are eligible for admission in the Summer Jobs & Youth Program:

- Deficient in basic literacy skills;
- School dropout;
- Homeless, runaway, or foster child;
- Pregnant or parenting;
- Offender;
- Individuals (including a youth with disabilities) who requires additional assistance to complete an educational program or secure and hold employment.

Below is a summary of the results of the OSA site visits to the three selected WIBs.

a. South Coastal Career Centers (SCCC)

Funding and Expenditures

SCCC received \$1,055,446 in ARRA funds to supplement the existing program supporting the Summer Jobs & Youth Program. These funds are available through June 2011. During our analysis of the ARRA grant funds available, SCCC provided the OSA with various communications in which the DOL strongly encouraged states and municipalities to use as much of these funds as possible to operate an expanded Summer Jobs & Youth Program during the summer of 2009. Additionally, EOLWD set a goal of spending 60% of regional ARRA youth funding on education and employment activities in the summer of 2009.

SCCC's Quarterly Financial Status Report (QFSR) for the period May 1, 2009 through September 30, 2009 indicated that SCCC had expended \$643,783 of the \$1,055,446 it was awarded by EOLWD to support its Summer Youth Jobs Program. SCCC also expended \$6,556 in ARRA funds for its pre-summer youth program. ARRA funds expended by SCCC from the beginning of the ARRA program to September 30, 2009 totaled \$650,339, or 61.6% of the total award. Accordingly, it appears that SCCC has achieved and exceeded the desired goal of 60%.

Also, according to the QFSR provided for the same period, SCCC has approximately \$405,107 remaining from its ARRA allocation to support the Summer Jobs & Youth Program over the next two summers. It is expected that most of the remaining ARRA funds will be expended in the summer 2010 program, with little or no funds left for 2011.

Applying the above-referenced eligibility criteria, SCCC was able to certify 262 qualified participants for enrollment in its 2009 Summer Jobs & Youth Program.

Review Results

Of the 262 qualified participants, only 260 were actually enrolled and received compensation from the ARRA Summer Jobs & Youth Program allocation and were enrolled for a 25-hour per week, six-week period (150 hours). Of the 260 active participants, our review disclosed that SCCC determined that 131 were classified as individuals who required additional assistance to complete an educational program or to secure and hold employment; 65 were classified as school dropouts; nine were deemed to be deficient in basic literacy skills; 31 were classified as from foster care or homeless; five were deemed to be single parents; and 19 were determined to be offenders. Our review also disclosed that of the 260 active participants eligible for 150 hours, 83 participated less than 100 hours, with 30 of the 83 participating in less than 50 hours. Employment for these 260 youths was concentrated between local municipalities and nonprofit agencies. It was also determined that two of the qualified participants never reported to either the SCCC for training or their actual worksites. Our reconciliation of qualified participants also determined that SCCC reported to EOLWD that 262 had participated in the program.

Recommendation

Overall, the OSA found SCCC to be in compliance with the enrollment of eligible youths pursuant to directives issued by the DOL and EOLWD. However, SCCC needs to develop stricter controls for the monitoring of MOSES to ensure that the number of participants is accurate and that applicants who do not complete a substantial portion of the offered program hours are not reported to EOLWD in the same manner as participants who have achieved a higher degree of participation.

Auditee's Response

SCCC responded by stating that the ARRA funding that it received presented significant issues for its operation. SCCC was operating with limited staff and the impact of the recession, particularly the number of unemployed seeking services from SCCC, coupled with the compliance issues associated with the ARRA funding, placed an undue burden on the overall operations at SCCC. In order to administer the SCCC 2009 Summer Jobs & Youth Program, SCCC had to hire and train additional staff and design, develop, and distribute recruitment strategies and application materials to comply with additional filing and reporting requirements associated with the receipt of ARRA funding. Despite these difficulties, the former Executive Director stated that the benefits derived from the

ARRA funding provided critical services and invaluable opportunities to those participants who were able to take full advantage of the programs offered at SCCC.

b. Career Center of Lowell (CCL)

Funding and Expenditures

CCL received \$838,160 in ARRA funds to supplement the existing program supporting the Summer Jobs & Youth Program. These funds are available through June 2011. During our analysis of the ARRA grant funds available, CCL provided the OSA with various communications in which the DOL strongly encouraged states and municipalities to use as much of these funds as possible to operate an expanded Summer Jobs & Youth Program during the summer of 2009. Additionally, EOLWD set a goal of spending 60% of regional ARRA youth funding on education and employment activities in the summer of 2009.

CCL's QFSR for the period July 1, 2009 through September 30, 2009 indicated that CCL had expended \$525,025 (62.6%) of the \$838,160 it was awarded by EOLWD to support its Summer Jobs & Youth Program. Accordingly, it appears that CCL has achieved and exceeded the desired goal of 60%.

Also, according to the QFSR provided for the same period, CCL has approximately \$313,135 remaining from its ARRA allocation to support the Summer Jobs & Youth Program over the next two summers. It is expected that most of the remaining ARRA funds will be expended in the summer 2010 program, with little or no funds left for 2011.

Applying the above-referenced eligibility criteria, CCL was able to certify 362 qualified participants for enrollment in its 2009 Summer Jobs & Youth Program.

Review Results

Of the 362 qualified participants, only 327 were actually enrolled and received compensation from the ARRA Summer Jobs & Youth Program allocation and were enrolled for a 25-hour per week, six-week period (150 hours). Of the 327 active participants, our review disclosed that CCL determined that 178 were classified as individuals who required additional assistance to complete an educational program or to secure and hold employment; 94 were classified as school dropouts; 28 were deemed to be deficient in basic literacy skills; 21 were classified as from foster care or homeless; and six were

deemed to be single parents. Our review also disclosed that, of the 327 active participants eligible for 150 hours, 67 participated in less than 100 hours, with 25 of the 67 participating in less than 50 hours. Employment for these 327 youths was concentrated between local municipalities and nonprofit agencies. It was also determined that 35 of the qualified participants never reported to either the CCL for training or their actual worksites. Our reconciliation of qualified participants also determined that CCL reported to EOLWD that 362 had participated in the program.

Recommendation

Overall, the OSA found CCL to be in compliance with the enrollment of eligible youths pursuant to directives issued by the DOL and EOLWD. However, CCL needs to develop stricter controls for the monitoring of MOSES to ensure that the number of participants is accurate and that applicants who do not complete a substantial portion of the offered program hours are not reported to EOLWD in the same manner as participants who have achieved a higher degree of participation.

Auditee's Response

CCL responded by stating that despite some budgetary and administrative constraints, the goals and objectives of the ARRA funding received were accomplished. However, a greater number of low-income youths were not eligible for participation in the CCL Summer Jobs & Youth Program because they did not meet the eligibility criteria required by ARRA. Documentation was also a significant obstacle for many of the youths who initially applied for participation in the CCL program. When informed of the required documentation that each participant had to produce in order to be considered for enrollment, many either did not or could not produce the required documentation, whereas others never returned to CCL.

c. Brockton Area Workforce Investment Board (BAWIB)

Funding and Expenditures

BAWIB received \$878,918 in ARRA funds to supplement the existing program supporting the Summer Jobs & Youth Program. These funds are available through June 2011. During our analysis of the ARRA grant funds available, BAWIB provided the OSA with various communications in which the DOL strongly encouraged states and municipalities to use as much of these funds as possible to operate an expanded Summer Jobs & Youth Program during the summer of 2009.

Additionally, EOLWD set a goal of spending 60% of regional ARRA youth funding on education and employment activities in the summer of 2009.

BAWIB's QFSR for the period May 1, 2009 through September 30, 2009 indicated that BAWIB had expended \$269,109 of the \$878,918 it was awarded by EOLWD to support its Summer Jobs & Youth Program. BAWIB also expended \$5,817 in ARRA funds for its pre-summer youth program. ARRA funds expended by BAWIB from the beginning of the ARRA program to September 30, 2009 totaled \$274,926, or 31.2% of the total award. Accordingly, it appears that BAWIB did not achieve the desired goal of 60%.

Also, according to the QFSR provided for the same period, BAWIB has approximately \$603,992 remaining from its ARRA allocation to support the Summer Jobs & Youth Program. It is expected that most of the remaining ARRA funds will be expended in the summer 2010 program, with little or no funds left for 2011.

Applying the above-referenced eligibility criteria, BAWIB was able to certify 129 qualified participants for enrollment in its 2009 Summer Jobs & Youth Program.

Review Results

Of the 129 qualified participants, all but two participants were actually enrolled and received compensation from the ARRA Summer Jobs & Youth Program allocation and were enrolled for a 25-hour per week, six-week period (150 hours). Of the 129 qualified participants, our review disclosed that BAWIB determined that 62 were classified as individuals who required additional assistance to complete an educational program or to secure and hold employment; 39 were deemed to be deficient in basic literacy skills; 11 were classified as from foster care or homeless; 13 were deemed to be single parents; and four were determined to be offenders. In addition, 15 of these participants were also classified as being school dropouts. Our review also disclosed that of the 127 active participants eligible for 150 hours, 60 participated in less than 100 hours, with 17 of the 60 participating in less than 50 hours. Employment for these 127 youths was a concentration between local municipalities and nonprofit agencies. It was also determined that two of the qualified participants never reported to either the BAWIB for training or their actual worksites. Also, our reconciliation of qualified participants determined that BAWIB reported to EOLWD that 129

individuals had participated in the Summer Jobs & Youth Program. We believe that this overstatement may be a problem with the use of MOSES and BAWIB's monitoring of the system.

Recommendation

Overall, the OSA found BAWIB to be in compliance with the enrollment of eligible youths pursuant to directives issued by the DOL and EOLWD. However, BAWIB needs to develop stricter controls for the monitoring of MOSES to ensure that the number of participants is accurate and that applicants who do not complete a substantial portion of the offered program hours are not reported to EOLWD in the same manner as participants who have achieved a higher degree of participation. Lastly, our review indicated that BAWIB was unable to achieve the goal set by EOLWD of expending 60% of ARRA funding.

Auditee's Response

BAWIB responded by stating that the ARRA funding that it received presented significant issues for its operation that inhibited BAWIB from achieving the 60% goal set by EOLWD. BAWIB noted that the timing of the receipt of ARRA funds, its limited staff, and the additional compliance issues associated with ARRA funding placed an undue burden on the overall operations at BAWIB. Furthermore, unlike the other two WIBs that we visited, the BAWIB's Summer Jobs & Youth Program is coordinated with the University of Massachusetts Donahue Institute, which manages the recruitment of youths for BAWIB's Summer Jobs & Youth Program. BAWIB also indicated that because of limited staffing it had to hire and train additional staff and design, develop, and distribute recruitment strategies and application materials to comply with additional filing and reporting requirements associated with the receipt of ARRA funding.

APPENDIX I**THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT**DEVAL L. PATRICK
GOVERNORTIMOTHY P. MURRAY
LT. GOVERNORJOANNE F. GOLDSTEIN
SECRETARY

June 25, 2010

Honorable A. Joseph DeNucci
Auditor of the Commonwealth
One Ashburton Place, Room 1819
Boston, MA 02108

Re: ARRA Summer Youth Employment Program and WIA Youth
Worker Stimulus Funding

Dear Auditor DeNucci:

On behalf of Joanne F. Goldstein, Secretary of the Executive Office of Labor and Workforce Development (EOLWD), please accept our appreciation for the audits that your office undertook regarding ARRA Summer Youth Employment Program and WIA Youth Worker stimulus funding for the South Coastal Career Centers, the Career Center of Lowell, and the Brockton Area Workforce Investment Board. Like you, our office is committed to insuring that public tax dollars are spent appropriately, efficiently, and effectively. We are pleased at your finding that the three workforce development entities were in compliance with the rules, regulations, policies, and directives issued by the United State Department of Labor and EOLWD.

At the same time, we appreciate your recommendation that each of the entities needs to develop stricture monitoring controls. Secretary Goldstein has instructed the Division of Career Services to develop a plan to address your recommendations, and to report to her regarding those efforts within sixty days. We are confident that the Division will take all necessary steps to comply with your recommendation.

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Hon. A. Joseph DeNucci
June 25, 2010
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Once again, on behalf of Secretary Goldstein, please accept our thanks
and please convey the same to your staff.

Very truly yours,



Gerald A. McDonough
General Counsel

cc: Joanne F. Goldstein

APPENDIX II

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENTDEVAL L. PATRICK
GOVERNORTIMOTHY P. MURRAY
LT. GOVERNORJOANNE F. GOLDSTEIN
SECRETARY

December 21, 2010

Honorable A. Joseph DeNucci
Auditor of the Commonwealth
One Ashburton Place, Room 1819
Boston, MA 02108Re: ARRA Summer Youth Employment Program and WIA Youth
Worker Stimulus Funding

Dear Auditor DeNucci:

As promised to you in my letter dated June 25, 2010, Secretary Joanne Goldstein instructed the Division of Career Services to develop a plan to address the recommendations in the audits that your office undertook regarding ARRA Summer Youth Employment Program and WIA Youth Worker stimulus funding for the South Coastal Career Centers, the Career Center of Lowell, and the Brockton Area Workforce Investment Board. In response, Michael Taylor, the Director of the Department of Workforce Development, has provide Secretary Goldstein with the attached response, which Secretary Goldstein instructed me to share with you.

Once again, on behalf of Secretary Goldstein, our thanks to you and your office for your thorough and useful reports.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gerald A. McDonough".
Gerald A. McDonough
General Counsel

cc: Joanne F. Goldstein

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