EXHIBIT 2

February 2, 2016

Mr. Christopher Donnelly, Director
Silicon Valley Workforce Investment Network
work2future
5730 Chambertin Drive
San Jose, CA 95118

Dear Mr. Donnelly:

WORKFORCE INNOVATION AND OPPORTUNITY ACT
PROGRAM REVIEW
DRAFT MONITORING REPORT
PROGRAM YEAR 2015-16

This is to inform you of the results of our monitoring review for Program Year (PY) 2015-16 of the Silicon Valley Workforce Investment Network's (work2future) Workforce Innovation and Opportunity Act (WIOA) program operations. This review consisted of an in-depth review of five programmatic topics (America's Job Center of California (AJCC) operations; communication; management information systems; oversight and monitoring; and programmatic operations) at the Local Workforce Development Area's (LWDA) administrative location(s), AJCC, and subrecipient locations that provide adult and dislocated worker services. In addition to the stated five topics, we also looked at the status of specific transitional activities.

This review was conducted by Ms. Ann Brito and Mr. Lamonte Love from November 16, 2015 through November 20, 2015.

Our review was conducted under the authority of WIOA Sections 183(a) and 184(a)(4). The purpose of this review was to determine if the LWDA needs to take any action on the programmatic topics above in its transition from WIA to WIOA, as well as, any need for technical assistance.

We collected the information for this report through interviews with work2future representatives; AJCC representatives; and adult and dislocated worker subrecipient representatives, observations of the client intake process and services provided by the AJCC, as well as, a limited review of applicable policies and procedures for PY 2015-16.

PROGRAM REVIEW RESULTS

During this transition period, our review identified the following finding.

FINDING ONE

Requirement: 65 Federal Register 50121 states, in part, the Federal Government is committed in improving access to services for persons with limited English proficiency. Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.

68 Federal Register 32290-3229 states, in part, The Department of Justice (DOJ) recipient provides written translations of vital documents for each eligible Limited English Proficient (LEP) language group that constitutes five percent or 1,000 whichever is less, of the population of persons eligible to be served or likely to be affected if encountered. It further states, safe harbor provisions do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

WIAD 04-20 states, in part, in order to avoid discrimination against LEP persons on the grounds of national origin, recipients must take reasonable steps to ensure that such persons receive, free of charge, the language assistance necessary to afford them access to the programs, services, and information those recipients provide. It further states, recipients have two primary ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation.

WIAD 04-20 Recipients and federal agencies are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The DOL's revised LEP guidance includes an individualized assessment that balances four-factors that should be applied when assessing language needs and deciding reasonable steps. The objective of the four-factor analysis is to suggest a reasonable balance that ensures meaningful access

by LEP customers to critical services while not imposing undue burdens. The four-factor analysis includes:

1. The number or proportion of LEP persons served or encountered in the eligible services population;
2. The frequency with which LEP individuals come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the recipient; and
4. The resources available to the recipient and costs.

Observation: We observed that work2future does not provide sufficient language services to all LEP customers at the four AJCC locations we visited. During our review we observed only English and Spanish speaking staff readily available to assist clients. Per 2014 estimates of the 2010 United States Census Bureau statistics, 51.2 percent of the population within work2future's service area, speak a language other than English. Work2future does not provide translation services in all languages for the populations which reside in their service areas. LEP customers entering the AJCC location are told by staff to bring their own translator or attend English as a Second Language class prior to accessing any type of service. When questioned about the lack of translation services available to work2future customers, administrators acknowledged they only have the ability to serve Spanish speaking clients at the AJCC and that they were unable to serve all LEP customers.

Recommendation: We recommend that work2future provide the Compliance Review Office with a corrective action plan indicating how they will be able to provide meaningful access to their programs and activities to all LEP customers and to ensure that the AJCC does not discriminate against LEP persons on the grounds of national origin.

We provide you up to 25 working days after receipt of this report to submit your response to the Compliance Review Office. Because we faxed a copy of this report to your office on the date indicated above, we request your response no later than March 9, 2016. If we do not receive a response by this date, we will release this report as the final report.

amb:6016

Please submit your response to the following address:

Compliance Monitoring Section
Compliance Review Office
722 Capitol Mall, MIC 22
P.O. Box 826880
Sacramento, CA 94280-0001

In addition to mailing your response, you may also FAX it to the Compliance Monitoring Section at (916) 654-6096.

This report is not a comprehensive assessment of all of the areas included in our review. It is work2future'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. Therefore, any deficiencies identified in subsequent reviews, such as an audit, would remain work2future'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 Ms. Ann Brito at (916) 651-3325 or Mr. Tom Liu at (916) 654-7393.

Sincerely,

JESSIE MAR, Chief
Compliance Monitoring Section
Compliance Review Office

cc: Tim Reynaga, MIC 50
Daniel Patterson, MIC 45
Greg Gibson, MIC 50
Georganne Pintar, MIC 50

amb:6016

bcc: Diane Ferrari, #911
Jessie Mar, MIC 22
Tom Liu, MIC 22
Mechelle Hayes, MIC 22
Chron File
Perm File

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