

SEP 28 2000

MEMORANDUM FOR: RAYMOND L. BRAMUCCI
Assistant Secretary for
Employment and Training

FROM: / S /
JOHN J. GETEK
Assistant Inspector General
for Audit

SUBJECT: New York State Department of Labor
Job Training Partnership Act Title III Expenditures
For the Period April 1 through June 30, 1999
Final Audit Report No. 02-00-214-03-340

The attached final report is submitted for your resolution action. We request a response to this report within 60 days. You are responsible for transmitting a copy of this report to New York State Department of Labor officials for resolution. However, we are providing a courtesy copy directly to them. If you have any questions concerning this report, please contact Richard H. Brooks, Regional Inspector General for Audit at (212) 337-2566.

Attachment

cc: Mr. James J. McGowan, Commissioner, NYSDOL
Marilyn K. Shea, New York ETA

**New York State
Department of Labor**

**Job Training Partnership Act
Title III Expenditures
April 1 to June 30, 1999**

Report No.: 02-00-214-03-340
Issued SEP 28 2000

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ACRONYMS

ASMB	Assistant Secretary for Management and Budget
ATDS	Automated Time Distribution System
CFR	Code of Federal Regulations
ETA	Employment and Training Administration
FSR	Financial Status Report
JTPA	Job Training Partnership Act
LEX	Labor Exchange System
NAFTA	North American Free Trade Agreement
NYSDOL	New York State Department of Labor
OIAS	Occupational Independent Analysis Section
PY	Program Year
USDOL	United States Department of Labor
WAFFR	Worker Adjustment Formula Financial Report
WIA	Workforce Investment Act

EXECUTIVE SUMMARY

At the request of the New York Regional Administrator, Employment and Training Administration (ETA), we performed an audit of the New York State Department of Labor (NYSDOL) Job Training Partnership Act (JTPA) Title III program expenditures covering the period April 1, 1999 through June 30, 1999. The audit objectives were to determine the reason for the large increase in program expenditures during the last quarter of PY 1998, and if these costs were allowable.

NYSDOL was awarded \$35,511,680 for PY 1998 under JTPA Title III, Governor's Reserve funding after the 2 percent Workforce Investment Act (WIA) set aside. For the three quarters ending March 31, 1999, NYSDOL reported expenses of \$7,526,048. Expenditures significantly rose in the fourth quarter of PY 1998 by \$15,776,284 and expenditures were \$23,302,332 for the year ended June 30, 1999.

AUDIT FINDINGS

NYSDOL transferred expenses from various cost centers to the JTPA Title III program to avoid recapture of PY 1998 allotments. As a result, expenditures reported on the Title III Worker Adjustment Formula Financial Report (WAFFR) for the year ended June 30, 1999, were overstated by \$6,102,478.

- Personnel services were overstated by \$5,023,129. Adjusting entries were made to transfer personnel service costs from other cost centers to the JTPA Title III program. NYSDOL officials did not have adequate documentation¹ to support adjusting entries and stated that costs were transferred to increase JTPA Title III expenditures, and avoid recapture and reallocation procedures.
- Expenditures for the Labor Exchange (LEX) system were overstated by \$1,079,349. NYSDOL allocated the preponderance of LEX system costs to the JTPA Title III program before June 30, 1999. Officials explained that the up-front charging of costs was to increase JTPA Title III expenditures to meet the 80 percent spending requirement.

Also, the allocation of LEX system costs was based on program funding levels and not on usage. Therefore, NYSDOL may not be assigning a fair share of LEX system costs to programs relative to benefits received.

¹ Documentation should be based on time distribution systems or alternative methods, such as random moment sampling, case counts or other quantifiable measures of employee effort approved by the Federal cognizant agency.

Subsequent to reporting PY 1998 Title III expenditures, ETA issued guidance on recapture and reallocation provisions for PYs 1998 and 1999. This guidance indicated that ETA would not implement the applicable recapture provisions which would otherwise be expected to take place for failure to expend at least 80 percent of Title III funds. Funds remaining in excess of JTPA closeout may be carried forward into WIA. However, Title III expenditures must be reported in accordance with cost principles.

RECOMMENDATIONS

We recommend that the Assistant Secretary for Employment and Training ensure that NYSDOL reduce June 30, 1999, reported JTPA Title III expenditures by \$6,102,478 for personnel service and LEX system costs, and begin recapture and reallocation procedures if required. We also recommend that the Assistant Secretary require NYSDOL to allocate personnel service costs to appropriate programs based upon after-the-fact distribution of actual activity of each employee, and develop a basis for cost distribution of the LEX system based upon relative benefits received.

NYSDOL underreported costs of six other cost centers (see Schedule A). The grant officer may determine whether underreported costs are allowable provided that revised Financial Status Reports are submitted by NYSDOL to the United States Department of Labor (USDOL), and there are sufficient funds available in each grant under which costs were incurred.

NYSDOL Response

NYSDOL responded to our draft report on August 15, 2000. NYSDOL disagreed with the findings and recommended reduction of \$6,102,478 as presented in the draft report. In its response, NYSDOL stated it has provided documentation to support both the personnel service and LEX system adjusting entries. Moreover, NYSDOL disagreed that adjustments were made to avoid recapture and reallocation procedures, and stated:

... The reason for the significant increase in expenditures during the fourth quarter was due to retroactive Time Distribution adjustments for allowable staff charges and non-personnel service adjustments for Labor Exchange (LEX) system costs, both representing costs associated with the New York State Department of Labor's One-Stop System. As explained to your staff, it is important to note that under the New York State Labor Law, Article 24, Worker Adjustment Act (WAA), the Department is authorized to reapportion JTPA dollars after March 31st; therefore, the Department was not able to process any adjustments or retroactive transfers until April 1, 1999.

OIG Comment

We have not taken exception to the New York State Labor Law or the timing of adjusting entries. However, on three separate occasions, including the entrance conference held on

February 14, 2000, signaling the beginning of the audit, NYSDOL representatives stated that costs were transferred to the Title III program to avoid losing program funds.

While a portion of personnel service and the LEX system costs may be allocable to the JTPA Title III program, it is NYSDOL's responsibility to adequately document that costs were allocated to a particular cost category to the extent that benefits were received. The transfer of costs from one grant to another should be made consistently among all programs and should not be done for one grant to overcome fund deficiencies, or to avoid restrictions imposed by law or terms of an award.

NYSDOL's response to the draft report has been incorporated in the report with our comments. It is also included in its entirety as an Appendix.

INTRODUCTION

BACKGROUND

The JTPA Title III program was designed to meet the employment and retraining needs of dislocated workers. Funds allotted under Title III provide for rapid response assistance; basic readjustment and support services; retraining; needs related payments and coordination with the unemployment compensation system.

NYSDOL was awarded \$35,511,680 for PY 1998 under JTPA Title III, Governor's Reserve funding after the 2 percent WIA set aside. For the three quarters ending March 31, 1999, NYSDOL reported costs of \$7,526,048. Expenditures significantly rose in the fourth quarter of PY 1998 by \$15,776,284 and expenditures were \$23,302,332 for the year ended June 30, 1999.

JTPA legislation states that funds obligated for any program year may be expended by each recipient during that program year and the two succeeding program years. Funds not expended as required, are subject to recapture and reallocation. JTPA Title III Sec. 303(b) states:

The amount available for reallocation is equal to –

- (1) the amount by which the unexpended balance of the State allotment at the end of the program year prior to the program year for which the determination under this section is made exceeds 20 percent of such allotment for that prior program year; plus*
- (2) the unexpended balance of the State allotment from any program year prior to the program year in which there is such excess.*

AUDIT OBJECTIVE

The audit objectives were to determine the reason for the large increase in program expenditures during the last quarter of PY 1998, and if these costs were allowable.

AUDIT SCOPE AND METHODOLOGY

We audited \$15,776,284 of the costs claimed for the period April 1, 1999 through June 30, 1999. We focused on costs of \$9.3 million in Basic Readjustment Services claimed during the period.

In performing the audit, we conducted interviews with officials from ETA - New York Region, NYSDOL, and a judgmental sample of managers and employees whose time and fringe benefit costs were transferred from other cost centers to the Title III program. Also, a judgmental sample of invoices pertaining to the LEX system were examined. We reviewed and analyzed information, and

supporting detail for selected journal entries where costs were transferred. We did not review NYSDOL's internal controls over financial reporting.

We judgmentally selected and interviewed managers and employees from cost centers of New York City, Hudson Valley and Workforce Development from the seven regions where personnel service costs were transferred. We also judgmentally selected and interviewed employment counselors and labor service representatives, whose labor charges were transferred.

The audit was performed in accordance with Government Auditing Standards issued by the Comptroller General of the United States. We conducted fieldwork from February 14, 2000 to March 24, 2000. A fieldwork exit briefing was conducted with NYSDOL officials on April 6, 2000.

FINDINGS AND RECOMMENDATIONS

I. PY 1998 FOURTH QUARTER EXPENDITURES

NYSDOL transferred costs from various cost centers to the JTPA Title III program in the fourth quarter of PY 1998 to avoid recapture of PY 1998 funds. To avoid recapture, NYSDOL increased Title III expenditures by:

- transferring \$5 million of personnel service costs from other cost centers to the JTPA Title III program; and
- charging LEX system costs of \$1 million to the JTPA Title III program, which should have been shared by other programs.

During fieldwork, NYSDOL officials stated that adjusting entries were made to get closer to spending 80 percent of the PY 1998 grant amount and to reduce the amount of grant funds subject to recapture and reallocation. As a result, expenses reported on the WAFFR for the year ended June 30, 1999, were overstated by \$6,102,478. 20 CFR Parts 627.435 (a) and (c) state:

- (a) *General . . . Costs charged to the program shall be accorded consistent treatment through application of generally accepted accounting principles appropriate to the JTPA program, as determined by the Governor.*
- (c) *Costs allocable to another Federal grant, JTPA program, or cost category may not be shifted to a JTPA grant, subgrant, program, or cost category to overcome fund deficiencies, avoid restrictions imposed by law or grant agreements, or for other reasons.*

Subsequent to reporting PY 1998 Title III expenditures, ETA issued guidance on recapture and reallocation provisions for PYs 1998 and 1999. This guidance indicated that ETA would not implement the applicable recapture provisions which would otherwise be expected to take place for failure to expend at least 80 percent of Title III funds. Funds remaining in excess of JTPA closeout may be carried forward into WIA. However, Title III expenditures must be reported in accordance with cost principles.

**Transfer of \$5 million in
Personnel Service Costs**

NYSDOL transferred \$5,023,129 of personnel service costs from other DOL programs to JTPA Title III in June 1999, as follows:

<u>PROGRAM</u>	<u>AMOUNT TRANSFERRED</u>
Wagner-Peyser	\$4,046,877
JTPA Title II General Administration	413,215
Unemployment Insurance	425,210
NAFTA Training	111,473
OIAS (ES)	18,385
Reemployment Services	<u>7,969</u>
Total	<u>\$5,023,129</u>

NYSDOL officials did not have adequate documentation² to support the above adjustments and stated that costs were transferred to increase JTPA Title III expenditures, to avoid recapture and reallocation procedures. As a result, JTPA Title III expenses were overstated by \$5,023,129. 20 CFR Part 627.440(e)(1) states:

Personnel and related non-personnel costs of the recipient's or subrecipient's staff, including project directors, who perform services or activities that benefit two or more of the cost objectives/categories identified in this section may be allocated to the benefitting cost objectives/categories based on documented distributions of actual time worked or other equitable cost allocation methods.
[Underscoring Provided.]

NYSDOL officials stated that retroactively transferring staff time previously charged to other activities was allowable since costs could have been charged to either the Wagner-Peyser program or the Title III program. The Wagner-Peyser program serves all job seekers including those who were "profiled" as UI claimants and eligible for Title III. NYSDOL asserted that as a result Wagner-Peyser staff can allocate a portion of their time to Wagner-Peyser or JTPA Title III programs. Furthermore, NYSDOL provided statistics to show that the adjusted time distribution represented approximately 12.3 percent

² Documentation should be based on time distribution systems or alternative methods, such as random moment sampling, case counts or other quantifiable measures of employee effort approved by the Federal cognizant agency.

of total Wagner-Peyser positions who were transferred to Title III, while the number of dislocated workers served during the same year represented 15.7 percent of total individuals served.

The original allocation of personnel service costs during the program year was based on predetermined percentages determined by management. The allocation percentages were confirmed by employees and certified by management at the end of each pay period.³ We interviewed employment counselors, labor service representatives and managers whose labor costs were transferred. Employees were not aware that their time allocation had been adjusted. Furthermore, employees were not able to retroactively estimate time spent on each program. However, they confirmed providing assistance to dislocated workers as part of their duties.

Although NYSDOL's statistics demonstrate the percentage of dislocated workers served, they do not support the amount of employee time spent serving the dislocated worker population. Each employee's original time allocation and management's subsequent certification at the end of each pay period is a better reflection of time spent serving dislocated workers than year end adjusting entries. Furthermore, 20 CFR Parts 627.435 (a) and (c) provide for the consistent treatment of costs and not the assignment of costs to a particular cost category to overcome fund deficiencies, or to avoid restrictions imposed by law or terms of the award.

NYSDOL Response

. . . we provided a narrative to the auditors justifying the amount of employee time spent serving the dislocated worker population which specifically justified our Time Distribution adjustment stating, "the dislocated worker population is harder to serve. They generally require a greater amount of time/service than the general population." Attached to this narrative was a chart comparing the dislocated workers served to staff time charged where we clearly illustrate that the staff hours spent serving the dislocated worker population were significantly more than the Time Distribution amounts we adjusted for. Based on the joint funding language provided in the Wagner/Peyser and JTPA legislation, we made a business decision to transfer only a portion of the allowable dislocated worker expenditures to JTPA. . . .

*OMB Circular A-87, Attachment A, paragraph C.3.c, provides the flexibility to transfer costs and make necessary business decisions regarding the funds available to NYSDOL. A-87 reads as follows: "Any cost allocable to a particular Federal award or cost objective under the principles provided for in this Circular may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by law or terms of the Federal awards, or for other reasons. **However, this prohibition would not preclude governmental units from shifting, costs that are allowable under two or more***

³ At the end of each pay period the system prompts employees to confirm their time distribution. Generally, employees confirm the predetermined allocation of time. Therefore, time is allocated based on management's original estimates and not on the actual time each employee spends performing a function.

*awards in accordance with existing program agreements. {sic}⁴ [Emphasis added.] A function or activity within the government organization that benefits two or more programs may be set up as a single cost objective. Costs allocable to that cost objective would be allowable under any of the involved programs costs. **The government can make a business decision regarding- what combination of funds made available under these programs would be applied to this cost objective.**” {sic}⁵ [Emphasis added.] Based on these cost principles, NYSDOL made a business decision regarding our One-Stop system expenditures that a portion of our DOL staff costs which are allowable activities and costs under both JTPA and Wagner/Peyser serving JTPA participants by providing BRS services would be charged to both programs in accordance with the flexibility granted under OMB Circular A-87. . . .*

OIG Comment

The argument that the dislocated worker population is harder to serve does not justify the retroactive transfer of payroll costs to Title III. NYSDOL’s adjustment to Title III was neither made in accordance with OMB requirements nor consistent with NYSDOL’s time distribution system which was established with the intention to ensure accurate accountability of funds.

At the exit briefing, we requested that NYSDOL prepare statistics to show the percentage of Wagner-Peyser positions transferred to Title III and the percentage of dislocated workers served. The intent of this request was to merely establish that there was a relationship to the amount transferred to Title III. It was not meant as a substitute for time distribution or alternative systems sanctioned by OMB. Again, the number of individuals served does not directly relate to the hours spent by staff on each individual. We interviewed employment counselors, labor service representatives and managers whose labor costs were transferred. These employees were not able to retroactively estimate time spent on each program.

NYSDOL argued that dislocated workers required a greater amount of staff hours and service than the general population. This statement is difficult to justify in the absence of verifiable statistics. One could also argue that the dislocated worker would require less service than the general population, given the talent and previous employment history of the dislocated workers.

NYSDOL cites OMB Circular A-87 and Assistant Secretary for Management and Budget (ASMB) C-10, Implementation Guide for OMB Circular A-87 which allows management flexibility for funding programs. However, the flexibility cited by NYSDOL does not supersede OMB Circular A-87,

⁴ The quotation from OMB Circular A-87 should have closed here. The remaining comments were extracted from ASMB C-10, Implementation Guide for OMB Circular A-87 published by the U.S. Department of Health and Human Services.

⁵ The extraction from ASMB C-10 should have closed here. Refer to footnote No. 2

Attachment B,11. h, (4) and (6) which mandates time distribution standards in support of salaries and wages when there are multiple activities or cost objectives:

4. Where employees work on multiple activities or cost objectives, a distribution of their salaries or wages will be supported by personnel activity reports or equivalent documentation which meets the standards in subsection (5) unless a statistical sampling system (see subsection (6)) or other substitute system has been approved by the cognizant Federal agency. . . . [Underscoring provided.]

6. Substitute systems for allocating salaries and wages to Federal awards may be used in place activity reports. These systems are subject to approval if required by the cognizant agency. Such systems may included, but are not limited to, random moment sampling, case counts, or other quantifiable measure of employee effort. . . .

NYSDOL's retroactive adjustment, does not comply with OMB requirements and is also inconsistent with NYSDOL's time distribution which was established to ensure accurate accountability of funds. The manual for NYSDOL's Automated Time Distribution System (ATDS) states:

. . . With ATDS, we can now be assured that all monthly financial reports for New York State Department of Labor are based on the most accurate time distribution data. . . . ATDS also gives the employee and supervisor the ability to edit the time distribution charges daily if the actual time worked by an employee deviates in any way from the codes assigned to their item number. . . . We replaced our manual procedure, now obsolete, with a computerized on-line system which ensures the most accurate accountability of departmental funds . [Underscoring provided.]

**JTPA Title III LEX System Costs
Overstated By \$1 Million**

Generally, NYSDOL allocated the preponderance of LEX system costs to the JTPA Title III program before June 30, 1999. Officials explained that the up-front charging of incurred costs was to increase JTPA Title III expenditures to meet the 80 percent spending requirement. As a result,

JTPA Title III program expenditures were overstated by \$1,079,349 as of June 30, 1999.

We judgmentally selected four purchase orders for \$2,954,574 allocated to the JTPA Title III program for testing. While NYSDOL determined that 39 percent was JTPA Title III program's fair share of LEX system costs, this was not how costs for three of the four purchase orders were allocated.

<u>PO Numbers</u>	<u>Total</u>	<u>JTPA Title III</u>		<u>JTPA Title II</u>		<u>Wagner-Peyser</u>	
	<u>Allocated</u>	<u>Amount</u>	<u>%</u>	<u>Amount</u>	<u>%</u>	<u>Amount</u>	<u>%</u>
1054	\$1,118,240	\$999,637	89.40	\$31,357	2.80	\$87,246	7.80
1054/5	837,279	770,171	91.98	24,159	2.89	42,949	5.13
1058	1,999,514	852,003	42.61	413,104	20.66	734,407	36.73
6931	<u>853,238</u>	<u>332,763</u>	<u>39.00</u>	<u>187,712</u>	<u>22.00</u>	<u>332,763</u>	<u>39.00</u>
Total	<u>\$4,808,271</u>	<u>\$2,954,574</u>	<u>61.40</u>	<u>\$656,332</u>	<u>13.70</u>	<u>\$1,197,365</u>	<u>24.90</u>
Allocation Based on NYS DOL Formula	<u>\$4,808,271</u>	<u>\$1,875,225</u>	<u>39.00</u>	<u>\$1,057,821</u>	<u>22.00</u>	<u>\$1,875,225</u>	<u>39.00</u>
Difference		<u>\$1,079,349</u>		<u>(\$401,489)</u>		<u>(\$677,860)</u>	

NYS DOL explained that the up-front charging of costs to Title III was done in order to meet the 80 percent spending requirement for the JTPA Title III program and that subsequent costs were primarily allocated to other programs. Ultimately, each program’s share of the total LEX system expenses was in accordance with NYSDOL’s allocation percentages when all expenses were incurred.

However, cost principles require consistent treatment. NYSDOL allocated each LEX system invoice prior to June 30, 1999, to fulfill spending requirement for Title III. As a result, invoices prior to June 30, 1999, were not allocated consistently and fairly, and the JTPA Title III WAFFR for the year ending June 30, 1999, was overstated by \$1,079,349.

NYSDOL Response

We discussed our accounting methodology with your audit staff and note that your report also states, “Ultimately, each program’s share of the total LEX system expenses was in accordance with NYSDOL’s allocation percentages when all expenses were incurred.” Our accounting methodology was consistent with the percentages established with the historical spending of our programs. Recent federal guidelines provided grantees bottom line authority, allowing for resources to share in the cost of operating a One-Stop as long as the percentage contributed by the individual funding source equals the benefit received. This methodology is outlined in the Federal Register on Resource Sharing. Our methods were consistent with these resource sharing agreements and cost allocation guidelines.

. . .we used historical spending to determine our projected benefit received and therefore we allocated the LEX costs as we have historically spent in the ratio of 39 percent (Wagner/Peyser), 39 percent (JTPA TIII), 22 percent(JTPA TIIA). . . .

OIG Comment

Again, NYSDOL allocated the preponderance of LEX system costs to the JTPA Title III program before June 30, 1999, and has not applied these percentages consistently to record LEX system costs.

Recommendations

We recommend that the Assistant Secretary for Employment and Training ensure that NYSDOL reduce June 30, 1999, reported JTPA Title III expenditures by \$6,102,478 for personnel service and LEX system costs, and, if required begin recapture and reallocation procedures. We also recommend that the Assistant Secretary require NYSDOL to:

- allocate personnel service costs to appropriate programs based upon after-the-fact distribution of actual activity of each employee;
- allocate costs of the LEX system on a consistent basis; and
- submit revised financial reports for underreported costs on the other grants.

II. OTHER MATTERS - ALLOCATION OF LEX SYSTEM

NYSDOL allocated \$13.6 million of LEX system costs to programs based on funding levels and not on projected usage. Therefore, NYSDOL may not be assigning a fair share of LEX system costs to programs relative to benefits received. OMB Circular A-87, Attachment A, C.3(a) and 20 CFR Part 627.440(a) require that costs are allocable to a particular cost category to the extent that benefits are received by such category.

Guidance is provided by the Department of Health and Human Services *Cost Principles and Procedures for Developing Cost Allocation Plans and Indirect Cost Rates for Agreements with the Federal Government*, Section 4.6.2 which states the suggested basis for cost distribution of data processing is system usage.

NYSDOL budgeted 39 percent of the equipment and installation costs associated with the LEX system to the JTPA Title III and Wagner-Peyser programs, and 22 percent to the JTPA Title II program. These allocation percentages were based on individual funding levels for activities related to One-Stop centers and not based on actual usage.

Costs for the LEX system consisted of new equipment, network development and PCs. Software and hardware purchased included personal computers, hubs, servers, routers, cabling, and site preparation. The purpose of the LEX system is to serve a diverse customer base including JTPA Title III program participants. According to NYSDOL purchased equipment was sent to local employment services offices. The system will feature a job bank for applicants to search for jobs and a talent bank for employers to search for job applicants.

During fieldwork, NYSDOL officials stated that funding levels were used as an allocation basis because the LEX system was in development and usage information was not available. Though we agree that actual usage information may not be available, using funding levels as an allocation basis is not an acceptable method of distributing costs. NYSDOL should look into developing other methods such as prior actual or projected usage to better align the cost with the benefit received.

Recommendation

We recommend that the Assistant Secretary for Employment and Training require NYSDOL to develop a basis for cost distribution of the LEX system based upon relative benefits received.

NYSDOL Response

. . . We disagree with your statement that we used funding as a basis for our cost allocation. We have clearly demonstrated that we used historical spending to determine our projected benefit received and therefore we allocated the LEX costs as we have historically spent in the ratio of 39 percent (Wagner/Peysner), 39 percent (JTPA TIII), 22 percent (JTPA TIIA), which we provided in a memo to the ETA auditors. Therefore, we reiterate that the basis of our allocations was historical spending and not funding.”

OIG Comment

NYSDOL did not provide documentation either during fieldwork or in its response to support that historical spending was utilized as the basis for cost allocation. The schedules provided to us during fieldwork show that funding was used to calculate the allocation bases. Regardless, allocating LEX system costs by funding or spending level does not meet the criteria in 20 CFR Part 631.13(a)(2) requiring costs be allocated to a particular cost category to the extent that benefits are received.

SCHEDULE A

**NEW YORK STATE DEPARTMENT OF LABOR
JTPA TITLE III EXPENDITURES
FOR THE PERIOD APRIL TO JUNE 1999
SUMMARY OF TITLE III OVERSTATED COSTS BY COST CENTER**

<u>COST CENTER</u>	<u>PERSONNEL SERVICES</u>	<u>LEX SYSTEM</u>	<u>TOTAL</u>
Wagner-Peyser	\$4,046,877	\$401,489	\$4,448,366
JTPA Title II General Administration	413,215	677,860	1,091,075
Unemployment Insurance	425,210	0	425,210
NAFTA Training	111,473	0	111,473
OIAS (ES)	18,385	0	18,385
Reemployment Services	<u>7,969</u>	<u>0</u>	<u>7,969</u>
Total	<u>\$5,023,129</u>	<u>\$1,079,349</u>	<u>\$6,102,478</u>