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June 4, 2019

**MEMORANDUM TO:** Fern Dominelli, Chief Administrative Officer  
Donna Stewart, Director of Integrated Social Services  
Manitoulin-Sudbury District Services Board  
Site #4087A

**FROM:** Dominique Morin, Service Delivery Manager  
Amy Breault, Employment and Training Consultant  
Employment and Training Division  
Ministry of Training, Colleges and Universities

**RE:** Employment Services, Youth Job Connection, Youth Job Connection: Summer  
Site Monitoring Feedback Report  
April 16 to 18, 2019

On behalf of the Ministry of Training Colleges and Universities, we would like to thank you and your staff for completing the monitoring questionnaire and meeting with us on April 16 to 18, 2019. We appreciated your responsiveness in completing the site compliance process for your organization.

We observed that you deliver a positive client experience while maintaining confidentiality and ensuring privacy. We have observed an improvement in meaningful and detailed case notes in your client files.

As part of the review, we selected participant and corresponding employer files (as applicable) from the ES, YJC and YJC-S programs. We also validated Employment Ontario Information System data against your participant files. In summary, we reviewed the following:

<i>Program</i>	<b># of Participant Files Reviewed</b>
<i>Employment Services</i>	35
<i>Youth Job Connection</i>	3
<i>Youth Job Connection: Summer</i>	12

Based on the monitoring visit findings and a review of the compliance requirements in your Employment Service agreement, the Ministry has identified that your Service Delivery Site 4087A is not meeting key compliance and accountability measures. Consequently, this site is not in compliance with the Employment Service agreement. As a result of this, Manitoulin-Sudbury District Services Board has been placed under Official Review.

Your Service Delivery Site is required to submit an Action Plan indicating milestones and timelines by July 16<sup>th</sup>, 2019 identifying your strategies to remedy the issues outlined in the attached appendix. The Action Plan must be signed by the Board Chair or appropriate oversight body.

Upon receipt of the Action Plan, the Ministry will review the plan and either approve the plan or inform you of adjustments required for approval.

If, six months after the implementation of the Official Review process, the Ministry determines that your organization has not completed the approved Action Plan and/or is still not in compliance with the Employment Service agreement, the Ministry may terminate the Employment Service agreement and/or not offer your organization a new agreement upon the expiry of the current agreement.

The Ministry is committed to working closely with your site over the coming months to provide strategic support as you work towards compliance and implement your Action Plan.

If you have any questions, please do not hesitate to contact Amy at (705) 235-1956.

Sincerely,



Amy Breault  
Employment and Training Consultant  
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Dominique Morin  
Service Delivery Manager  
[Dominique.N.Morin@ontario.ca](mailto:Dominique.N.Morin@ontario.ca)



# Appendix

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**Issue: NEEDS ASSESSMENT/DECISION MODEL**

**Programs: Employment Services, Youth Job Connection, Youth Job Connection: Summer**

**Timeline: Immediately**

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## PROGRAM REQUIREMENTS:

This decision model is a key tool to support each client file as evidence for decisions made throughout the services rendered to clients as required by the Ministry. The decision model is also essential to ensure that services are not provided in the same sequence for all clients.

To support a consistent approach to matching service needs with suitable interventions, service providers must have a client service decision model providing rationale for access to funded services. The set of indicators and definitions of client service needs listed below are proposed for use.

Keep in mind that the needs assessment is only one part of the decision model. Continue to support clients throughout their intervention until closure of service plans. Evidence of services provided should be well documented.

### **Employment Service**

In assessing an individual's need, all Employment Service providers must consider the following criteria when making decisions about service components to help clients achieve their desired outcomes. A clear rationale must be documented to support decisions made, based on an analysis of each individual's eligibility and suitability indicators and the Employment Service program's intended outcomes.

- **Demographics** – includes basic information about the individual, including gender, age, employment status, disabilities, source of income
- **Education** – includes level of education attained; consideration of education or credentials from outside of Canada or credentials not recognized in Ontario
- **Performance Indicators** – includes characteristics of individuals which prevent them from performing as required on the job.
- **Interpersonal Skills** - includes difficulties in maintaining positive relationships with employers and/or work peers.
- **Market Perceptions** – includes characteristics which lead potential employers to form negative biases or perceptions about the individual and their ability to perform on the job and may include substantial time out of school, work or training.
- **Motivation** – includes willingness and ability to begin employment; attitudes which prevent clients from initiating the job search or participating fully in the activities required to secure and maintain employment.
- **Employment Expectations** – includes the need for assistance in clarifying the individual's job preferences, or their understanding of how their skills meet opportunities in the job market.
- **Self-Marketing** – includes the ability of clients to successfully present themselves to employers in the competitive or hidden job markets.
- **Stability Issues** – includes lifestyle patterns, personal situations, or self-management issues that may impede the ability of the client to initiate a successful job search and remain employed.

As mentioned above, based on this information, the service provider will identify and decide if the Employment Service is appropriate, and whether assisted or unassisted Employment Service will most benefit the client.

## **Youth Job Connection**

The service provider must conduct a client assessment, which must:

- work with the individual to determine or clarify career and employment goals, and the education, training needed to achieve those goals;
- identify other factors that can affect the individual's ability to succeed in employment program/services or activities (e.g., need for child care, family or transportation issues, etc.);
- determine whether the individual is ready to participate in the program immediately, or if they should be referred to other supports first (e.g., addictions counselling, etc.);
- determine characteristics that can prevent the individual from performing required job tasks, or that can lead to biased perceptions about their ability to do the job, and consider these factors in making service decisions;
- determine the individual's interpersonal skills and motivation.

## **Youth Job Connection: Summer**

The service provider must conduct a client assessment, which must:

- gather information from the individual on their background and situation, and determine suitability for the program;
- work with the individual to determine or clarify career and employment goals, and the education and training needed to achieve those goals;
- identify other factors that can affect the individual's ability to succeed in employment program/services or activities (e.g., family or transportation issues, etc.);
- determine whether the individual is ready to participate in the program immediately, or if they should be referred to other supports first (e.g., mentoring, counselling, etc.);
- determine characteristics that can prevent the individual from performing required job tasks, or that can lead to biased perceptions about their ability to do the job and consider these factors in making service decisions. The service provider can work with the client to discuss the need for a diagnostic assessment, when there is an indication of a physical, mental, social or learning condition affecting a participant's progress. Service providers are expected to coordinate with other education, health or social services where a need for testing has been identified. Diagnostic assessments are not supported through Youth Job Connection: Summer funding;
- determine the individual's interpersonal skills and motivation.

## **OBSERVATIONS FROM FILE REVIEW:**

- During the file review for the above-mentioned programs, the tool/process used to determine which program and which service components would effectively help clients achieve their desired outcome was not adequate to effectively assist with needs determination.
- There was also the lack of evidence in the programs mentioned above to indicate that services were tailored to meet client needs, as clients appear to have received a similar level of service even though the notes reflected diverse service needs (e.g. anger management, literacy challenges, completion of grade 12 diploma, etc.).
- We also observed that most service plans did not provide rationale for services provided. Many files reviewed had similar service plans.

## **ACTION:**

- Document evidence that justify the rationale for service choices and decisions which support and inform the relevance of client service.
- Use the decision model consistently. The decision model should contain all components of each program delivered.
- It is important that **staff be trained** on the proper use and implementation of the decision model.



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**Issue: ASSISTED SERVICE CLIENTS**

**Program: Employment Services**

**Timeline: Immediately**

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### PROGRAM REQUIREMENTS:

The Employment Service assisted services target vulnerable populations and those under-represented in the labour market. Using the suitability criteria described above in the need's assessment/decision model section and in the ES guidelines, focus must be placed on clients with the greatest risk of continued, long-term unemployment or those who are marginalized in the labour market.

The "assisted" service components – Job Search, Job Matching, Placement and Incentives, and Job/Training Retention -- are **suitable for individuals who need more intensive, supported, perhaps one-on-one services.**

The Resource and Information (RI) component is a resource that is available to everyone in the community including the employed, under-employed, job seekers, students, laid off workers, apprentices, internationally trained and employers. There are no eligibility or access criteria for RI. These clients usually have a clear understanding of market perceptions, good motivation and work habits, and strong interpersonal skills.

### OBSERVATIONS FROM FILE REVIEW:

We have reviewed 35 client files in the Employment Services program. The level of service offered does not meet the definition of assisted services in 34 of the 35 client files.

The file review focused on 35 Employment Service client files that were:

- Opened and closed in less than two weeks towards the end of the fiscal year
- Opened for longer than one year
- Opened for two years or more

Description of the client files reviewed	Total # of Client Files Reviewed	# of Client Files that should NOT count as Assisted Service	Client Service Plan # Reviewed	Observations
Client files opened longer than 104 weeks	15	15	3156244 3259054 3918223 3927028 3960791 4001411 4035235 4309296 4352367 4412847 4596831 ✓ 4681616 ✓ 4987877 ✓ 5026588 ✓ 5086284 ✓	<ul style="list-style-type: none"> <li>All 15 files were closed this fiscal year. 3 of the 15 were closed between February 20 and March 29, 2019.</li> <li>Although the 15 clients counted as part of the 2018-19 results, there is no evidence to support that these clients received assisted services during the 2018-19 fiscal year.</li> <li>These clients should have been closed in previous fiscal years.</li> </ul>
Client files opened between 52 and 103 weeks	6	6	5026607 ✓ 5054250 ✓ 5384480 ✓ 5412453 ✓ 5433248 ✓ 5482826 ✓	<ul style="list-style-type: none"> <li>All 6 client were closed this fiscal year. 3 of the 6 were closed between February 27 and March 29, 2019.</li> <li>Although the 6 clients counted as part of the 2018-19 results there is no evidence to support that these clients received assisted services during the 2018-19 fiscal year.</li> <li>These clients should have been closed in previous fiscal years.</li> </ul>
Client files that were opened for less than 2 weeks	8	7	5978013 ✓ 5996104 ✓ 6064983 ✓ 6236209 ✓ 6242580 ✓ 6249052 ✓ 6257696 ✓ 6285124 ✓	<ul style="list-style-type: none"> <li>All 8 client files were closed this fiscal year. 5 of the 8 were closed between February 27 and March 29, 2019.</li> <li>There is no evidence to support that these clients required and received assisted services, according to the definition of assisted services, during their intervention.</li> </ul>
Client files that were opened and closed during the week of March 25, 2019	6	6	6242941 ✓ 6272178 ✓ 6292601 ✓ 6296468 ✓ 6299433 ✓ 6299464 ✓	<ul style="list-style-type: none"> <li>All 6 clients were all opened and closed during the week of March 25, 2019.</li> <li>There is no evidence to support that these clients required and received assisted services, according to the definition of assisted services, during their intervention.</li> </ul>
<b>Totals</b>	<b>35</b>	<b>34</b>		

**ACTION:**

- A clear rationale must be documented to support decisions made on services offered, based on an analysis of each individual's eligibility and suitability indicators and the Employment Service program's intended outcomes.
- Individuals who only require resume writing services and less intensive services should be served through RI.
- Only true assisted service clients are entered in CaMS.
- Client files should be closed in a timely manner.



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**Issue: SERVICE PLANS****Programs: Employment Services, Youth Job Connection: Summer****Timeline: Immediately**

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**PROGRAM REQUIREMENTS:****Employment Services**

When assisted services are deemed to be the most appropriate, service providers must work with the client to develop an Employment Service Plan. As the client begins to work with the Employment Consultant and more in-depth analysis and assessment are undertaken, additional service needs may be identified.

Employment Service Plans must:

- note clear achievable goals
- build on or match skills, interests and needs identified by employer or in relation to labour market information
- identify steps to reach the goals and methods for monitoring progress
- show evidence of personal ownership, (i.e. sign-off, record of discussions, use of self-assessment tools)
- indicate supports are in place for job search or training/education;
- indicate ongoing monitoring, and show that supports are in place as needed
- be updated as steps are accomplished, skills or knowledge are acquired, or new information is acquired through such activities as volunteer placements or job test and hire.

The service provider will also ensure continued support for access to other required services and programs, i.e. literacy, ESL/FSL, settlement services or any other services that support the client employability and resolve possible stability issues. An effective Employment Service Plan must be updated to incorporate required changes as well as new opportunities as they arise.

**Youth Job Connection: Summer**

Likewise to the ES program, service providers must work together with the participant to develop an individualized employment service plan. The plan supports a participant's activities, services and supports, based on their employment and employability needs and career and educational goals.

The plan must:

- describe clear, achievable goals;
- build on expressed interests and needs identified by the participant for employment, education or training goals;
- identify steps or concurrent activities to reach the goals and methods for monitoring progress;
- list supports in place for services;
- be updated regularly;
- demonstrate the participant's agreement and ownership of the plan.

**OBSERVATIONS FROM FILE REVIEW:**

- During the file review, it was observed that the Service Plans did not include all the mandatory items as listed above.

**ACTION:**

- Integrate all the required items as per the above list. Monitor and evaluate progress and adjust the plan accordingly.

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**Issue: CLIENT SUITABILITY**  
**Program: Youth Job Connection: Summer**  
**Timeline: Immediately**

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### PROGRAM REQUIREMENTS:

Youth Job Connection: Summer provides a highly specialized set of services that can be customized to the participant's needs. The program is open to all eligible youth aged 15 to 18, with a focus on those who are experiencing challenging life situations and are at risk of experiencing poor transitions between education and work.

All participants who access Youth Job Connection: Summer are expected to have intensive service needs that require many, or all the service components. The suitability measure ensures that service providers are providing services to individuals who are most in need.

### OBSERVATIONS FROM FILE REVIEW:

- During the file review, it was observed that there was no evidence of a clear rationale to support decisions made on services offered. Clients appear to have received a similar level of service even though the notes reflected diverse service needs.
  - For example, it was observed during the file review that a few participants participated in the same placement for two consecutive summers and no evidence of a clear rationale to support this decision.
- Most of the participants files had a very minimal amount of suitability indicators. Further, the majority of the clients appeared to have the school factors suitability indicator recorded without supporting documentation.
- We also observed several discrepancies in between the suitability information indicated on the participant registration form and those indicated in EOIS-CAMS.

### ACTION:

- The decision model must provide a rationale for access to funded services in the YJC-S program.
- Use the Participant Suitability Indicators to assist in ensuring services provided to individuals who are most in need of the program.
- For the school factor suitability criteria to be recorded, there must be evidence in the client file based on an assessment or confirmation from a Student Success teacher, school committee or school board representatives that the individual experiences any of the following school factors which are known to be linked with a higher risk of not graduating:
  - failing course(s)
  - skipping classes/frequent absences
  - being bullied/harassed
  - feeling of not belonging at school
- Data entry in CaMS must mirror what is on the participant registration form.

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**Issue: CASE MANAGEMENT**  
**Program: Youth Job Connection: Summer**  
**Timeline: Immediately**

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### PROGRAM REQUIREMENTS:

Service Providers must manage the participant's overall case and provide counselling and general support on a one-to-one basis.



- guiding participants through their employment or education/training preparation and plan, with a focus on sequencing of activities and referrals for employment readiness;
- monitoring and documenting the participant's information and employment activities;
- revising and updating the employment service plan;
- informing participants of the consequences of not following through with planned activities or commitments, and applying consequences in a fair and consistent manner;
- helping participants to identify further needs and access other sources of support for income, transportation, counselling, legal services or other life circumstances that have an effect on readiness for employment;
- helping participants overcome problems as they arise by focussing and building on their strengths and capabilities, including setting appropriate expectations for success.

Once the job placement starts, job coaching must be provided. This involves working with both parties—the participant and employer—to resolve difficulties and problem solve where necessary. Job coaching activities include one-on-one or on-site training, identifying and resolving workplace issues, monitoring the participant's performance and progress, and explaining the employer's expectations or workplace standards to the participant.

The primary focus of case management is on employment issues, but service providers must also be prepared to support participants with a broad range of life stabilization issues. Please refer to the YJC-S guideline on page 12.

Further, service providers must set up the placement, confirm the terms, and monitor the job placement. This includes assessing workplace safety, the appropriateness of the placement, working with employers to meet their needs, and negotiating incentives and supports. There was no evidence of these assessments in the files that were reviewed.

Funding for incentives is available to employers to offset costs to temporary reductions in productivity, increased supervision requirements, and other expenses resulting from hiring a participant through a job placement. These incentives are meant to encourage employers to hire and train participants. The need for and amount of the incentive will be negotiated between the service provider and employer. This negotiation is based on the job skill level and complexity, as well as the length of the on-the-job training.

#### OBSERVATIONS FROM FILE REVIEW:

- Although there is evidence of an initial meeting to register clients and a second meeting to sign the "Training Incentive Placement Agreement", there is no other evidence of job coaching and ongoing support during the placement.
- There was no evidence of the placement assessments as mentioned above (workplace safety, appropriateness of the placement, etc.) in the files that were reviewed.
- During the file review, it was observed that placements incentives were allotted based on the maximum incentive of \$2,500 for all participant (overall maximum for flow-through funds per participant). The file review also uncovered that one participant was allotted over the \$2,500 maximum.
- It was also observed that a client was hired by an immediate family member for a summer placement. Employer must not hire immediate family members, such as parent, spouse, sibling or child in the job placement.

#### ACTION:

- Deliver the program requirements as per the YJC-S guidelines and document a clear rationale to support decisions made on services offered.
- The service provider should meet regularly with participants and placement employers throughout the program.

- Youth can not participate in a placement until all the terms and conditions have been agreed upon by all parties. The Training Incentive Placement Agreement should be signed on or before the start of the placement.
- Service providers must ensure that funding model is based on the job skill level and complexity, as well as the length of the on-the-job training. The amount of the incentive must be negotiated between the service provider and employer.
- Ensure no immediate families are hired in the future.

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**Issue: SERVICE COORDINATION**

**Programs: Employment Services, Youth Job Connection, Youth Job Connection: Summer**

**Timeline: Immediately**

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**PROGRAM REQUIREMENTS:**

Service Coordination is a measure of how the service provider's coordination, integration and supported access to and from other services are effectively incorporated into the clients' Service Plans in all programs listed above. It indicates the level the service provider is giving clients to help them access and participate in education, training, and other types of community services.

**OBSERVATIONS FROM FILE REVIEW:**

- Observations from the file review demonstrate a lack of evidence to support the formalized referrals that took place.
- Further, in the YJC-S, program, all clients were classified as receiving a referral from Employment Ontario.

**ACTION:**

- Self-referrals will not count towards final results in this measure and should not be noted as formalized referrals in the client files.
- A formalized referral is a planned, supported and coordinated arrangement. Service providers must document formal referrals in client files **once the client confirms that they are registered** to receive or have received the referral supports as a result of the service coordination effort.

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**Issue: DATA INTEGRITY**

**Programs: Employment Services, Youth Job Connection, Youth Job Connection: Summer**

**Timeline: Immediately**

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**PROGRAM REQUIREMENTS:**

Employment Ontario Service Providers are responsible for the integrity of data at a service delivery level. It is crucial that service provider teams understand the importance of data integrity and how the data can affect outcomes. Report analysis can identify opportunities for continuous improvement by highlighting strengths and areas for development.

This knowledge enables organizations to develop and implement mitigation measures based on issues identified and results achieved. Moreover, it will allow to be proactive in planning activities.

**OBSERVATIONS FROM FILE REVIEW:**

Several data integrity observations were made in the above sections of this letter.



- It was noted that there were multiple discrepancies between the EOIS-CaMS information and what is noted in the file documentation, especially around suitability indicators. This may impact data validity in EOIS-CaMS as well as results in the Detailed Service Quality Report.
- During the YJC file review, it was observed that 2 of 3 files reviewed had variances in between the total expenditure amounts in the file and what was entered in EOIS-CaMS. 1 file's total expenditures exceeded the \$7,500 maximum.
- During the YJC file review, it was observed that 2 of 3 files reviewed had no EOIS-CaMS records of stipend, participant supports, and training supports paid. All expenditures were paid using employment supports category.
- It was observed during the file review, that follow-ups were not completed accurately and according to each program guideline. Follow-up completion dates in EOIS-CaMS appeared to be completed as per program guidelines and deadlines. However, we observed during the file review that file documentation confirmed follow-ups were completed past due dates and not according to guidelines.

#### ACTION:

- As the "business owners of data", to ensure the data collected is entered accurately, timely and completely.
- It is essential to understand how site-level, or back-end, data collected in EOIS-CaMS comes together in reports to provide the necessary ingredients to enable better decision making. Resources are available for support on EOPG in the EOIS-CaMS section. For example, the Employment Service Data Dictionary is a vital tool in understanding EOIS-CaMS field descriptions and relevant performance definitions.
- Review the Performance Management System section on EOPG (in the Employment Services section) provides training resources such as:
  - ES Best Practices and Understanding Results - Service Provider Sessions
  - ES Reporting: Data Integrity and Data Analysis
  - Employment Service Performance Management System for Service Delivery Site Managers
  - ES Client Pathways
- These resources are intended to help in continuous improvement of service delivery analysis and data integrity. Please note that the review and study of reports is crucial to ensure data completeness and accuracy.
- Follow-ups must be completed on-time, as per guideline requirements. The actual date that the follow-up was conducted must be entered in EOIS-CaMS. Proper evidence of the follow-up results must be documented in the client file.

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#### **Issue: FILE DOCUMENTATION**

**Programs: Employment Services, Youth Job Connection, Youth Job Connection: Summer**

**Timeline: Immediately**

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#### PROGRAM REQUIREMENTS:

##### **Employment Services**

For all ES Assisted Services, the file must contain:

- Include a completed, signed and dated Employment Service Participant Registration form
  - A new form must be completed for each Service Plan. If the client is returning, a new form must be completed.
  - Consultants must validate on page 3: the client's birth certificate, driver's license, or other photographic identification has been reviewed as well as client income (the consultant must state which document was viewed).
    - **Please ensure that copies of personal information are *not* kept on file.**
- Clearly document Client Service Planning and Coordination (CSPC) activities and case management support, with providers documenting the full range and rationale for services including, but not limited

to, client assessments, Employment Service Plans, service referrals and evidence of progress and follow-up services

- Exit outcomes, survey results and follow-up information must be on file

For all clients receiving Job Search Services, the file must contain:

- A clear and achievable Employment Service Plan for employment, training, or education, describing how it relates to the local labour market, education or training opportunities in the community. (Please refer to the Service Plan section above for further recommendations.)
- Rationale to support program participation, including an assessment of the client's credibility in the labour market, along with suitability and employability information. (Please refer to the Decision Model section above for further recommendations.)
- Clear explanations of how service is expected to improve employability, suitability, and credibility in the labour market
- Rationale for workshop attendance and noted outcomes
- Evidence that service provider staff are monitoring and supporting the client's job search and developing alternative strategies as necessary. Please refer to the Service Plan and Decision Model sections above for further recommendations.

### **Youth Job Connection**

Documentation for participants:

- Documentation of Client Service Planning and Coordination activities with information on services provided and rationale including but not limited to participant assessment, employment service plan, service referral, mentoring activities, and evidence of the participant's progress;
- If financial supports are provided, the participant's file must contain the reason for the support, the amount of the supports, and an authorized service provider signature for the support;
- For job placements, a rationale describing how the placement meets needs of participant and employer, and if incentives or supports are provided, information on the reason, amount and terms of support;
- Documentation of mandatory site visits and other monitoring conducted; employer and participant follow-up and outcomes;

Documentation for employers:

- completed, signed and dated Employment Ontario Employer Registration form;
- proof of employer's eligibility and suitability for the program;
- employer profile information including size, sector, and number and types of placements provided; information on employer incentives, if applicable, including amount of incentives and disbursement of funds in the Youth Job Connection and Youth Job Connection: Summer Job Placement/Job Match/Job Trial Agreement and the Youth Job Connection and Youth Job Connection: Summer Job Placement/Job Trial Agreement for Participant on Service Provider Payroll
- documentation of any site visits or other monitoring activities, issues or incidents if any and resolutions;
- In case of incomplete placements, documentation of approach and steps the service provider took to resolve the issue or reasons for early termination.

### **OBSERVATIONS FROM FILE REVIEW:**

- During the Employment Services and Youth Job Connection file review, it was observed that the program requirements listed above were not consistently documented in the client files.
- During the Youth Job Connection file review, 2 of 3 files reviewed did not have an Employer Registration Form
- During the Youth Job Connection file review, 2 of 3 files reviewed did not have a Training Incentive Placement Agreement and one of these files had a Training Incentive Placement Agreement that was signed after the placement began.



During the YJC-S file review, it was observed there was no evidence of timesheets on file to validate hours worked and missing proof of payments.

**ACTION:**

- As mentioned in the sections above, client files must document a clear rationale to support decisions made on services offered, based on an analysis of each individual's suitability indicators and the program's intended outcomes.
- Documentation requirements above must be implemented, as per the Employment Services, Youth Job Connection and Youth Job Connection: Summer guidelines.
- The Training Incentive Placement Agreement should be signed on or before the start of the placement.
- Remember that personal information must be managed to ensure the respect of privacy and adherence to all contractual requirements and applicable laws. For example, copies of personal identification pieces (i.e. Driver's License, SIN card) should not be kept on file.