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## EDUCATION AND LABOR CABINET

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March 5, 2024

Michael Thoroughman, Chair  
TENCO Workforce Development Board  
Primary Plus  
927 Kenton Station Drive  
Maysville, KY 41056

Denise Dials, Workforce Director  
TENCO Workforce Development  
201 Government Street, Suite 300  
Maysville, KY 41056

Dear Mrs. Dials and Mr. Thoroughman:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY22 Comprehensive Monitoring Report issued on January 31, 2024. While these responses have been accepted, the Cabinet reserves the right to review files of this cohort, as well as all participant files for ongoing compliance purposes.

If you have any questions, please contact Jim Beyea at [jim.beyea@ky.gov](mailto:jim.beyea@ky.gov) or email at [oetmonitoringteam@ky.gov](mailto:oetmonitoringteam@ky.gov).

Sincerely,

A handwritten signature in cursive that reads "Jim Beyea - DWD".

Jim Beyea  
Assistant Director

Attachment(s): TENCO PY22 WIOA Final Monitoring Report

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# **WIOA Comprehensive Monitoring Review**

**TENCO LWDB**

**November 6, 2023**

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## **Monitoring of the TENCO Local Workforce Development Area**

The TENCO Local Workforce Development Area was monitored by the monitoring team staff on November 6, 2023. Department of Workforce Development (DWD) monitoring staff included Anita Doster, Amanda Cummins, and Donna Burke. The team reviewed Workforce Innovation and Opportunity Act (WIOA) Title 1B programs, specifically Adult, Dislocated Worker (DW), and Youth relating to Program Year 2022. Also, a comprehensive financial review was conducted of all referenced programs.

A closing conference was held on December 15, 2023. A brief review of monitoring was given by Jim Beyea, Amanda Cummins, and Donna Burke.

The purpose of the monitoring review was to analyze information regarding the above-noted formula programs and grants operated by TENCO's LWDB in order to:

- determine if the programs are meeting their goals and objectives;
- assess whether the programs are operating in accordance with federal, state, and local requirements, and
- identify promising practices.

For purposes of this monitoring review, a finding could denote noncompliance with the following:

- applicable laws and regulations;
- relevant Office of Management and Budget (OMB) circulars;
- uniform administrative requirements;
- state policies and directives; and/or
- local policies and procedures.

The monitoring team appreciates the time and information provided by TENCO's LWDB staff. This report is critical to the continuous improvement of the workforce system leading to better services and outcomes for jobseeker and employer customers.

## **Title 1B Executive Summary**

The following is a description of findings and observations found when monitoring WIOA Title 1B Programs:

The Program monitor(s) identified two (2) findings and no observations, and the financial monitor identified one (1) finding and no observations during the PY22 Comprehensive Monitoring Review. The findings identified within this report are indicative of operational or quality issues worthy of attention and/or follow-up.

A finding requires immediate attention and corrective action, up to and including a corrective action plan. An observation may be a concern that, if left unaddressed, may result in future finding(s). An observation may also be a concern in which a written clarification from the LWDB could alleviate the concern. The operational challenges identified in the observations are related to those activities for which the Commonwealth has a strategy or an initiative, but for various reasons, the action is incomplete or insufficient.

Incorporated in this summary is a list of applicable findings and observations for each program based on the Comprehensive Monitoring Review. Following the summary are the individual program details.

### **Program Monitoring Summary**

#### **Finding(s):**

1. Violation of Local Case Note and Data Entry Policy
2. Incomplete IEP/ISS

#### **Observation(s):**

No observations

### **Financial Monitoring Summary**

#### **Finding(s):**

1. Overpayment of travel

#### **Observation(s):**

No observations.

# PROGRAM MONITORING DETAILS

## FINDING(S)

### Finding (1):

Violation of Local Case Note and Data Entry Policy

### Issue(s):

1. Adult: Workforce Case #003487451 is missing required monthly contact during March, 2023. Workforce Case #003459595 is missing required monthly contact for November and December 2022. Workforce Case #003460226 is missing required monthly contact for November 2022.
2. Youth: Workforce Case #003463697 had a case note for December 2022, but it was not entered until January 2023. Workforce case #003463324 is missing required monthly contact for July, 2022.

### Citation(s):

TENCO Workforce Development Board, Policy Number 46 – Case Note & Data Entry  
Effective Date: December 15, 2021:

“Career Counselors shall ensure that data and required documentation for individuals participating in the WIOA Title I programs are entered timely, accurately, and adequately into the statewide data system. Completion should include all mandated sections as well as the customer’s goals, strengths, obstacles (if applicable), assessments, and financial aid information (if applicable) to reflect a holistic training plan. If the customer enrolls in a training service, the criteria to train must be completed detailing the results from the assessments utilized to justify that training is necessary for the individual to secure self-sustaining employment. The KEE Suite workforce case should be completed within 10 days of the person’s enrollment.

A case note must be included that provides information on the orientation of services available to the customer, family dynamics, geographical location, work history, strengths, obstacles, educational experience, goals, priority status (adult only), and other information relevant to the initial intake.”

### Instance(s):

5/15 (33%)

### Required Action:

LWDB must ensure that all case notes are completed in KEE Suite at the time of event or contact and should be clear, relevant, and useful and be within compliance with the local area and state policies.

### LWDB Response:

During the past year, the TENCO Workforce Development Board established a new Direct Service Provider for A/DW. The DS provider has employed a full-time WIOA Manager who is responsible for evaluating case notes monthly for quality, detail, and timeliness. We have also implemented a customer case note log that is reported to the Manager each month. The manager will review the log to ensure case notes are entered each month at time of service.

TENCO has also recently hired a Youth Coordinator that has a similar role and will be reviewing case notes monthly, reviewing the youth case note log, and providing technical assistance to youth providers. Case note expectations will be presented to each Career Counselor.

The TENCO WDB established criteria, which includes case note expectations, which is included in the DS (youth/adult/dw) contracts that are evaluated quarterly to determine renewal of contracts.

**DWD Response:**

DWD accepts this response. Finding has been resolved.

**Finding (2):**

Incomplete IEP

**Issue(s):**

1. Youth: Workforce Case #003463732 and #003463697 have incomplete assessments under the IEP. Workforce Case #003463697 did not have case notes or tool tests to verify the participant was not basic skills deficient or what form of assessment was completed with this participant to determine that information.

**Citation(s):**

Workforce Innovation and Opportunity Act Sec. 129 (c)(B) "...develop service strategies for each participant that are directly linked to 1 or more of the indicators of performance described in section 116(b)(2)(A)(ii), and that shall identify career pathways that include education and employment goals (including, in appropriate circumstances, nontraditional employment), appropriate achievement objectives, and appropriate services for the participant taking into account the assessment conducted pursuant to subparagraph (A), except that a new service strategy for a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant under another education or training program;"

According to Policy (29 U.S.C. § 3164(c)(1)(B)). The IEP/ISS shall contain the following components: short and long-term goals identified collaboratively to achieve the participant's specific occupational goal, objectives identified collaboratively as action steps to achieve each of the established goals, all goals and objectives shall address holistic case management including the elimination of barriers identified during assessment. All goals and objectives shall be measurable and attainable within the identified timeframe.

**Instance(s):**

2/15 (13%)

**Required Action:**

LWDB must ensure that all elements of the IEP/ISS are completed prior to providing training services to avoid in any future and/or repeated findings.

**LWDB Response:**

The A/DW Manager and the Youth Coordinator will review the IEP of all active files. Files that are incomplete will be completed within 45 business days. The Manager and Youth Coordinator utilize a quarterly quality control document to ensure electronic files are complete. The IEP tab will be added to the quality control document as a method to ensure new records are regularly reviewed. Technical

assistance will be provided within 30 days for all Career Counselors regarding the importance of developing and maintaining complete records.

**DWD Response:**

DWD accepts this response. Finding has been resolved.

## **FINANCIAL MONITORING DETAILS**

### **FINDING(S)**

**Finding (1):**

Overpayment of travel.

**Issue(s):**

BTADD employee received overpayment for travel of \$24.01. Grant 273AD22 was used for this reimbursement.

**Citation(s):**

TENCO Workforce Development Board Policy No. 5 states, "Transportation: Travel expenses will be covered for reasonable personal or public transportation, using the most economical means of travel. The actual cost of air and land travel fares will be paid, not to exceed the cost of accommodations for air coach class, unless only first class is available. When personal vehicles are used for travel, the mileage rate paid based on the current Buffalo Trace ADD rate. When ground transportation costs exceed public transportation by air coach class fares, a Board member will be reimbursed at the specified mileage rate, not to exceed the total of the airline ticket."

**Instance(s):**

One instance.

**Required Action:**

Per email received from the workforce director on November 22, 2023, we are in agreement the amount of **\$24.01** is a disallowed cost. It is requested this amount to be deducted from a future drawdown submitted within the next 30 days after receiving this report.

Once completed, please submit documentation **with this report** showing this request has been completed.

**LWDB Response:**

Per an email from Mr. Beyea, the Cabinet accepted resolution of this finding by BTADD, fiscal agent for the TENCO WDB, submitting a check in the amount of \$24.01 from the general fund. Check #16547 has been issued.

**DWD Response:**

Reimbursement has been received. This finding is resolved.

## **BEST PRACTICES**

The Department of Workforce Development would like to acknowledge the Best Practices conducted by TENCO Workforce Development team. They are as follows:

### **PROGRAM**

- Utilization of Peer Review of Workforce Cases is very effective.
- Case notes are documented well; need to train, goals, strengths, and weaknesses are well documented.
- Titles of case notes entered, and documents uploaded are very useful.

### **FISCAL**

- Quick response to document requests during monitoring
- Great communication during monitoring with fiscal and workforce director.



## WAGNER-PEYSER MONITORING

The TENCO Kentucky Career Center was reviewed by the monitoring team, Jim Beyea, Donna Burke, and Amanda Cummins on December 7, 2023. Donna Burke monitored Wagner-Peyser Act compliance in the Morehead Kentucky Career Center and met with Tonia Prewitt, Regional Program Manager and one randomly selected customer was also interviewed.

The purpose of this monitoring was to assess the extent to which the various Wagner-Peyser activities are carried out in the Career Center. This includes the following:

- how activities are contributing to program performance;
- how activities are coordinated with other Career Center function and partners;
- how activities support Kentucky's Unified State Plan and strategic direction; and
- how activities are being provided to business customers.

Staff at the Morehead Career Center, located at 1225 US Hwy 60, Suite 106, Morehead KY, serve an average of 130 customers per week. According to Mrs. Pruitt, the counts are captured by the new sign-in system called, "Greetly," at the reception desk. This system captures all traffic that enters the career center whether the customer is there for UI, job search, OVR, WIOA services, etc. The customers select the reason they are visiting the career center which then, this data is accounted for through Greetly.

The Wagner-Peyser staff at the career center consists of nine employees. The local partners at this location are Office for the Blind (OFB), Office for Vocational Rehabilitation (OVR), JVSG, and WIOA. Partner space is available for Adult Education, Job Corp, SNAP, and Senior Employment which are not onsite. The OSO position is currently open. When this position is filled, it is the intent for this position to be housed at the Morehead Career Center for the OSO does have responsibilities at each career center within the TENCO region. A veterans' representative is at the career center but is not at this office daily due to other meetings in the area.

The Career Center is a one story building with visible signage, along with veteran priority signage and standard operation hours of 8:00 AM – 4:30 PM. There is one entrance for the customers and it is handicap accessible. The busiest times at this center are Mondays and Tuesdays within the timeframe of 8:00 AM – 1:00 PM. Upon entering the main lobby area, the registration staff instruct customers to sign-in at the Greetly iPad at the front desk. Customers enter basic identification information and answer a few questions regarding whether they have an appointment and/or what type of services they are seeking. If the customer is not familiar with electronic devices, the receptionist will assist. Once the information is entered, the associate providing that service requested will then greet the customer in the lobby. Customer wait time is generally less than 5 minutes. A television monitor is in the waiting room displaying information of interest to career center customers. A monitor is available at the front desk that shows resume tips, phone numbers, career center services, etc. A KCTCS stand with information regarding resources is also available to customers in the waiting area.

The resource area has eleven operational computers, one workstation accessible for those with disabilities, plus three interview rooms which are utilized for Employer interviews or private conversations either over the phone or with customers they may have with employers. The eleven computers were within a large cubicle to enhance the privacy of the customers.

Morehead, considered the “Hub”, hosts RESEA workshops every Tuesday at 9:00 AM. Partners and employers are invited to this event. Business service reps meet at this career center quarterly to discuss outreach and other upcoming job fairs and meetings. This center contains one large training room for assistance in such events and one conference room.

The center has an ID-Me section that is available to customers for unemployment purposes. The ID-Me is a verification process where an individual is unable to commit fraud in anyway. Fingerprinting services are also unavailable at this center. If requested, the customers are directed to partnering agencies that offer this service.

One randomly selected customer was interviewed. The customer was visiting the Career Center for unemployment reasons. She stated that she didn’t have to wait. This was her first visit to the career center and she indicated everything was going great and the front desk employee, Brenda, was extremely helpful. She had no recommendations to improve services at the Career Center at this time.

**Wagner-Peyser Observation(s):**

- A. In reference to Training and Employment Notice 08-23, SWAs must:
  - a. Distribute this notice and the attached posters to each one-stop center, ES office managers, as well as interested and potentially interested stakeholders by April 1,2024.
  - b. Each one-stop center must prominently display the approved Complaint System posters in their facility by April 1, 2024. Each one-stop center poster must contain information for the local office Complaint System Representative and State Monitor Advocate in the designated fields.
  - c. By April 1, 2024, SWAs must publish the posters on their ES website’s main page. The posters that are published on the website must contain information for the SWA Complaint System Representative and State Monitor Advocate in the designated fields.

**Wagner-Peyser Recommendation(s):**

- A. Although the TEN noted above has a deadline of April 1, 2024, it is highly recommended to proceed with this notice and have it displayed in all one-stop centers to ensure this requirement is met and made available to customers.

**BEST PRACTICE**

- The sign in system, Greetly, used at the Morehead Career Center is a very great system utilized to capture all traffic entering the center. This system assists in capturing customers entering the center for a variety of services provided by the career center, OVR/OFB, RESEA, WIOA, etc. Reports can also be run from this system along with line graphs. This is a great tool in assisting the career center and its partners when capturing data for reporting purposes and up-to-date data.

**END OF REPORT**