



Andy Beshear
GOVERNOR

EDUCATION AND LABOR CABINET

Jamie Link
SECRETARY

Mayo-Underwood Building
500 Mero Street, 3rd Floor
Frankfort, Kentucky 40601
(502) 564-3070

July 2, 2025

Tiffanie Reeves, Workforce Director
Bluegrass Local Workforce Development Board
699 Perimeter Drive
Lexington, KY 40517

Jon Dougherty, Chair
Bluegrass Workforce Development Board
Education Director
2421 Fortune Drive, Suite 150
Lexington, KY 40509

Dear Ms. Reeves and Mr. Dougherty:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY23 Comprehensive Monitoring Report issued on May 14, 2025. 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 me via email at maria.russell@ky.gov or oetmonitoringteam@ky.gov.

Respectfully,

/s/Maria "Tess" Russell
Assistant Director, Division of Technical Assistance
Department of Workforce Development

Attachment: PY23 WIOA Comprehensive Monitoring Review

WIOA Comprehensive Monitoring Review

BLUEGRASS LWDB

February 24, 2025

Monitoring of the Bluegrass Local Workforce Development Area

The Bluegrass Local Workforce Development Area was monitored by the monitoring team staff on February 24, 2025. A Wagner-Peyser visit was conducted on February 26, 2025, at the Lexington Kentucky Career Center by Amanda Cummins and Donna Burke. Department of Workforce Development (DWD) monitoring staff included Lisa Burton, 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 2023. Also, a comprehensive financial review was conducted of all referenced programs.

A closing conference was scheduled for May 14, 2025, at 2PM EST. A brief review of monitoring was given by Tess Russell, Lisa Burton, 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 Bluegrass' 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,
- 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/or guidance's and/or
- local policies and procedures

The monitoring team appreciates the time and information provided by Bluegrass' LWDB staff. This report is critical for the continuous improvement of the workforce system, leading to better services and outcomes for jobseekers and employers.

Title 1B Executive Summary

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

The Program monitors identified three (3) findings and no observations, and the financial monitor identified two (2) findings and no observations during the PY23 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. Incomplete ISS
2. Missing Service Program in KEE Suite
3. Workforce Case Not Exited Properly or On Time

Observation(s):

No observations.

Financial Monitoring Summary

Finding(s):

1. Guidance 21-004 Not Followed.
2. Mileage Overpayment.

Observation(s):

No observations

PROGRAM MONITORING DETAILS

FINDINGS

Finding (1):

Incomplete ISS

Issue(s):

Youth Workforce Case #003517664. One (1) participant had an incomplete ISS and was missing a short-term goal that addresses education or employment goals. No other items were missing from the ISS.

Citation(s):

BGWIOA-N20-O05 Individual Employment Plans & Individual Service Strategies:

Individual service strategy requirement for youth programs – An ISS is similar to an IEP but is an activity unique to WIOA youth-funded programs. Development of an ISS is required for an individual as a condition of eligibility for WIOA youth programs. An ISS must be completed to receive services under any WIOA youth-funded program element and must be developed based on needs identified in an objective assessment. An ISS must include:

- i. A direct link to one or more of the 14 program elements,
- ii. Identification of career pathways that include education and employment goals,
- iii. Career planning, and
- iv. Prescribed achievement objectives and service strategy.

Instance(s):

1/18 (5%)

Required Action:

LWDB must adhere to BGWIOA-N20-O05 Individual Employment Plans & Individual Service Strategies. All ISS must be entirely completed and include a short-term goal. A training must be given to all staff regarding guidance BGWIOA-N20-O05. A sign-in sheet for this training, the training syllabus, and training documents must be completed and forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

In person training was provided to the Talent Development Specialists (TDS) on June 17, 2025. The importance of the IEP/ISS was reviewed as well as the importance of completing the required sections. A copy of the training PowerPoint and staff sign-in sheet was provided to the Division of Technical Assistance Monitoring Staff for review.

DWD Response:

DWD accepts this response. Finding has been resolved.

Finding (2):

Missing Service Program in KEE Suite

Issue(s):

Youth workforce case #003505862. One (1) Participant had documents such as a receipt and a voucher for the purpose of tools, uploaded to KEE Suite, however, there was no service program entered in KEE Suite for this supportive service. This data is related to a participant and is needed for federal reporting.

Citation(s):

DWD WIOA Data Entry Policy 22-001:

Performance reporting is a federal requirement and a top priority at both the state and federal level. Effective February 15, 2022, all data as it relates to the participant is needed for federal reporting (please reference the PIRL Layout) must be entered into the state system of record within ten (10) days of its occurrence for the data to be extracted, reviewed, and corrected if necessary. Performance measurement data not entered within the ten-day timeframe specified herein may result in a questioned cost. Support and performance teams will review records on a case-by-case basis for corrections but will not correct records that do not affect current program year performance measures. Such corrections will be required at the local level within thirty (30) days of notification by the review team

Instance(s):

1/18 (5%)

Required Action:

LWDB must adhere to the DWD WIOA Data Entry Policy 22-001. Data such as service programs must be entered into Kee Suite within 10 days of its occurrence. Case managers must verify information is in KEE Suite at the time of enrollment for customers in WIOA. A training must be given to all staff regarding the Violation of Kentucky Career Center DWD WIOA Data Entry Policy 22-001. A sign-in sheet for this training, the training syllabus, and documents must be completed and forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

In Person Training was provided to the Talent Development Specialists (TDS) on June 17, 2025. The importance of the timely service program entries into KEE Suite was discussed. A copy of the training PowerPoint and staff sign-in sheet was provided to the Division of Technical Assistance Monitoring Staff for review.

DWD Response:

DWD accepts this response. Finding has been resolved.

Finding (3):

Workforce Case Not Exited Properly or On Time

Issue(s):

Adult: Workforce #003526987. One (1) Participant had a workforce case that was not timely exited when 90 days had elapsed.

Citation(s):

TEGL 10-16 Change 3 Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs “— The date of exit from the program is the last date of service. Specifically:

The date of exit cannot be determined until 90 days have elapsed since the participant last received services; furthermore, there must be no plans to provide the participant with future services. At that point, the date of exit is applied retroactively to the last date of service. For determining whether 90 days have elapsed since the participant last received services, do not include receipt by the participant of any self-service, information only services or activities, or follow-up services, as these services do not delay, postpone, or affect the date of exit. Because the date of exit is retroactive to the last date of service, follow-up services may begin immediately following the last date of service if it is expected that the participant will not receive any future services other than follow-up services. Provision of follow-up services does not extend the date of exit.”

Instance(s):

1/18 (5%)

Required Action:

LWDB must ensure workforce cases are closed correctly and timely. Training must be given to staff regarding TEGL-10-16 Change 3. A sign-in sheet for this training, the training syllabus, and training documents must be completed and forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

In Person Training was provided to the Talent Development Specialists (TDS) on June 17, 2025. The importance of case notes and case management into KEE Suite was reviewed in addition to when to properly exit a participant. A copy of the training PowerPoint and staff sign-in sheet was provided to the Division of Technical Assistance Monitoring Staff for review.

DWD Response:

DWD accepts this response. Finding has been resolved.

FISCAL MONITORING DETAILS

FINDINGS

Finding (1):

DWD Guidance 21-004 Not Followed.

Issue(s):

Monthly reporting was incomplete in the Work System, that shows the monthly expenditures from the local area's accounting system.

Citation(s):

DWD Guidance 21-004 states, "Local Workforce Development Boards (LWDBs) submitting Monthly Financial Status Reports (FSRs) in the (WORK) System are required to submit financial data from their accounting system that substantiates the total amount of *Current Month Expenditures* being reported for each grant."

Required Action:

It is recommended that BGADD establish a protocol to verify the completeness of reports submitted into the Work System to avoid any future findings and/or the potential issuance of CAPs (Correction Actions Plans).

LWDB Response:

The Bluegrass Workforce Staff have established a process which will curtail the incompleteness of the reports in the future. Staff have been brought on board which will review the data of the reports prior to the submission into the WORK System. Staff have implemented a spreadsheet of all grants, and the information needed for the reports and will cross match to ensure accuracy.

DWD Response:

DWD accepts LWDB's response. Finding has been resolved.

Finding (2):

Mileage Overpayment.

Issue(s):

Employee travel mileage documentation was not consistent with the Google Maps/MapQuest documentation that was provided.

| Grant Number | Explanation | Overpayment |
|--------------|---|-------------|
| 274YT21 | On 7/26/23, 36.2 miles were claimed for reimbursement. Only 15.3 miles were traveled at .46. | \$9.61 |
| 274YT24 | On 6/28/23, 36.2 miles were claimed for reimbursement. Only 15.3 miles were traveled at .46. | \$9.40 |

| | | |
|---------|---|----------------|
| 271DW23 | Error in mileage claim totaling to one mile on days 7/6/23 and 7/7/23 at .46. | \$.92 |
| | TOTAL | \$19.93 |

Citation(s):

Referencing 200 KAR 2:006, "Mileage for in-state travel shall be based on the "Kentucky Official Highway Map", MapQuest website, Google Maps website, Google Maps website or similar mapping service. Out-of-state mileage shall be based on the most recent edition of the "Rand McNally Road Atlas", MapQuest website, Google Maps website, or similar web mapping service."

Required Action:

LWDB must ensure that the requirements meet the state regulation to avoid any future questioned and/or disallowed cost. Per the response, received on March 17, 2025, via Dropbox, the LWDB agreed that the amount of **\$19.93** is a disallowed cost. This amount will need to be submitted to the State using **non-federal funds**. Please submit this reimbursement to the following address within 30 days of receiving this report:

Kentucky Education and Labor Cabinet
 Department for Workforce Development
 Attn: Grants Management
 500 Mero Street
 Frankfort, KY 40601

Also, please include a completed transmittal form, per DWD Guidance 25-003, which is attached.

LWDB Response:

| |
|---|
| BGLWDA acknowledges the overpayment of \$19.93 and a check numbered #67520, for the full amount, was issued on 6/6/25 and mailed to the requested location. A copy of the transmittal form was submitted to the monitor for review. |
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DWD Response:

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|---|
| DWD accepts LWDB's response. Finding has been resolved. |
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BEST PRACTICES

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

PROGRAM

- Monthly case notes are entered timely with detailed notes and are titled.
- Title on document links is useful.
- Requested documents and spreadsheets were returned quickly.
- Documents were uploaded to Dropbox in a very organized manner and separated per program.
- Multi-page documents uploaded to Dropbox were in chronological order.
- The utilization of the “Service Completion Form” for workforce case services is useful with pertinent information.

FISCAL

- Quick response to document requests during monitoring.
- Very cooperative and professional.
- DWD commends BGADD for the self-reporting of the mileage information for Finding No. 2.

WAGNER-PEYSER MONITORING

The Bluegrass Kentucky Career Center was reviewed by a monitoring team members, Amanda Cummins and Donna Burke on February 26, 2025. Wagner-Peyser Act compliance was monitored at the Lexington Kentucky Career Center and met with Connie Schnell, Regional Program Manager. One customer was selected for an interview.

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 functions 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 Lexington Kentucky Career Center, located at 2473 Fortune Drive, Lexington, KY, serve an average of 120-174 customers per week. They serve an average of 1392 customers a month who only seek unemployment insurance services and other services such as job search (30 customers per month). According to Ms. Schnell, the counts are captured by a google spreadsheet at the reception desk. This spreadsheet captures all traffic that enters the career center whether the customer is there for UI, job search, OVR, WIOA services, etc. The customers provide the reason they are visiting the career center which then is noted on the spreadsheet.

The Wagner-Peyser staff at the career center consists of one office manager and one RESEA staff, two WIOA counselors, one Business Service, one WIOA Manager, one front desk greeter/reception, seven Wagner-Peyser staff, three JVGS/CDO, one senior employed who helps in the resource room through community action commission. The partners onsite are CDO, OFB/OVR (only in office on Tuesdays), VETS, and WIOA. Senior employment is housed off site. The adult education representative is located at the local college site and comes to the center as needed and presents on Tuesdays for orientations. The OSO position is housed at the Lexington Career Center. OSO is very involved in daily operations of career center, business service teams, and all events, monitoring, and tracking of participants of all programs utilizing the center. The OSO worked with Connie Schnell to make 12 local libraries certified access points, so customers can go to their local libraries to have access to the same computer systems the customer would use in the career center. This is a best practice for Bluegrass. The OSO developed and implemented processes that are considered Best Practices such as reporting on customer involvement and working with local area businesses, industrial authority, and others. The Business Service Rep coordinates quarterly regional meetings including all partner representatives, coordinates and plans job fairs, rapid response, and other outreach activities and services.

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 Monday within the timeframe of 8:00 AM – 4:30 PM and Wednesday and Thursday mornings. Upon entering the main lobby area, the customer is greeted warmly and asks the customer to sign-in and customer will state their need. Customers are asked if they are a veteran so that they can receive priority of service if so. The customer will wait in the lobby area until triaged to the person/area to suit their needs. Once the information is gathered, appropriate staff will greet the customers in the main lobby area and escort them to the appropriate

location (ex. Resource room, interview room, etc.). Customer maximum waiting time is 10 minutes but generally there is a very minimal wait time. There are tables and chairs provided for seating. A television monitor is in the lobby and resource room displaying information of interest to career center customers that shows information about partnering agencies, on-demand careers, and UI information. A large literature display is in the resource room that shows all the jobs available, upcoming job fairs, expungement clinics, and many partner and community resources.

The resource area has fifteen operational computers for customer use. Two workstations are wheelchair accessible. There are no operational phone stations but if a phone was needed, the customer would be given access to a phone. The computers are located within sight of all resource assistants. CDO and Wagner-Peyser staff have cubicles that sit along this resource room to make themselves available to the customers in need of assistance with the computers.

There are four interview rooms which are utilized for Employer interviews or private conversations either over the phone or with customers they may have with employers. This center has one large training room that is used for orientations, workshops and/or trainings. The interview room can be used each week by employers on Tuesdays after the RESEA class that is mandatory for RESEA identified individuals but is open and invites all other customers who are interested in attending.

The Lexington Kentucky Career Center hosts job fairs onsite as well as offsite. The Career Center partners with other agencies throughout the year to assist with job fairs and other resources. Other events also provided are virtual resume classes that are held two days a week, Tuesday and Thursday and employability and interviewing skills are taught on Thursdays.

The TEN 08-23 "File A Complaint" forms in English and Spanish were in the waiting room on the bulletin board. The bulletin board and the waiting room very neat and the forms included contact information to file a complaint. These forms were very visible and at eye level.

One customer was available for an interview. The customer reported that this was not her first time at this center. She indicated she was very pleased with the services she has received and the assistance that she is currently being provided. She stated she was present for unemployment insurance assistance and job searching. She stated that her experience with the staff at the Lexington Kentucky Career Center was incredible and that they have done so much to help her. She complimented the staff at the reception area, the staff in the resource room, and the communication that she received between her visits.

BEST PRACTICES

- This career center does an excellent job of building partnerships within the community.
- Very well organized and professional.
- One Stop Operator helped in making local libraries a certified access point to receive services.

END OF REPORT