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EDUCATION AND LABOR CABINET

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October 10, 2025

Becky Carnes-Miller, Executive Director
EKCEP WDB
100 Airport Gardens Rd.
Hazard, KY 41701

Keith Gabbard, Chair
EKCEP WDB
PO Box 159
McKee, KY 40447

Dear Ms. Miller and Mr. Gabbard:

Enclosed is the Department of Workforce Development (DWD) report of the monitoring review that was conducted on December 2, 2024, by the DWD monitoring team. The monitoring review covered the Workforce Innovation and Opportunity Act (WIOA) federally funded program of the EKCEP Local Workforce Development Board (LWDB) for PY23.

The monitoring review was conducted to determine if WIOA formula funds were utilized consistent with federal requirements and grant agreements, as well as to familiarize and collect effective grant management practices. A comprehensive financial review was also conducted in respect to the WIOA program.

In summary, the report contains three (3) WIOA Program Findings and one (1) Program Observation as well as one (1) Financial Finding and one (1) Observation. There were two (2) corrective action plans (CAPs) that were put in place and as of October 9, 2025, these CAPs have been resolved. Although no response is required for this report, 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 otmonitoringteam@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

EKCEP LWDB

December 2, 2024

Monitoring of the EKCEP Local Workforce Development Area

The EKCEP Local Workforce Development Area was monitored by the monitoring team staff on December 2, 2024. A Wagner-Peyser visit was conducted on December 9, 2024, at the Prestonsburg Career Center conducted by Donna Burke, RMA III. 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 held on March 28, 2025. A brief review of monitoring was given by Aveana Jackson, Maria (“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 EKCEP’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 EKCEP’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 three (3) findings and one (1) observation, and the financial monitor identified one (1) finding and one (1) observation 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. Violation of LWDB Case Note Policy
2. Missing Low-Income Eligibility Documentation
3. Workforce Cases Were Not Exited Properly or On Time

Observation(s):

- A. Missing tool tests on ISS

Financial Monitoring Summary

Finding(s):

1. Travel overpayment.

Observation(s):

- A. Miscalculation of WEX time.

PROGRAM MONITORING DETAILS

FINDINGS

Finding (1):

Violation of the LWDB Case Note Policy

Issue(s):

Youth: Workforce Cases #003500084, #003501804, #003499466, #003463429, #003503859, #003497576, #003492975, #003492639, #003499466, #003503859, and #003504151. Eleven (11) participants have multiple months of case notes and/or follow-up case notes that were entered beyond the 10-day timeframe allowed according to LWDB Case Note Policy.

Adult: Workforce Cases #003502692, #003503132, #003506054, #003509341, #003512492, #003514038, and #003524977. Seven (7) participants have multiple months of follow-up case notes that were entered beyond the 10-day timeframe allowed according to the LWDB Case Note Policy.

Citation(s):

EKCEP Client Services Handbook for Adult, Dislocated Worker, and Out-of-School Youth Section Four: Record Keeping and Reporting: Case notes synthesize and supplement information about a client and are intended to document the delivery and justification for WIOA services and activities. Case notes provide:

- Accurate record keeping that helps the Career Advisor plan, implement, and evaluate the services for each client.
- Accountability for the client, the Career Advisor, the contractor, and EKCEP.

A Career Advisor should record a case note whenever:

- A face-to-face meeting with a client has occurred.
- A phone conversation with a client has occurred.
- An electronic conversation with a client has occurred.
- A significant event related to the client's life or progress within the program has occurred.

Case notes should be written at the time of the event or contact and entered into KEE-Suite within 10 days.

Instance(s):

18/45 (40%)

Required Action:

This is a repeat finding from PY22. LWDB must adhere to the EKCEP Client Services Handbook for Adult, Dislocated Worker, and Out-of-School Youth Section Four: Record Keeping and Reporting. Data must be entered into Kee Suite within 10 days of its occurrence. In response to this finding, EKCEP area will be under a Corrective Action Plan (CAP) to address the violation of the LWDB Case Note Policy. LWDB must review all case notes entered in KEE Suite for each new active participant monthly. EKCEP area must create a list of all active participant files that were reviewed for the month and submit this list to DWD, via Dropbox. The EKCEP area will need to self-attest and sign-off to the validity and accuracy of case note data input in KEE Suite. This CAP

is effective March 28, 2025. The list mentioned above will be due on the last day of each month. This CAP will be ongoing for 6 months from the first date of submission.

LWDB Response:

EKCEP staff have reviewed the case note policy with field staff and emphasized the importance of entering the case note within 10 days of the client interaction. The Corrective Action Plan has been discussed with staff and the review of case note entries. EKCEP staff are reviewing case note entries on new and existing clients utilizing KEE Suite reports. EKCEP will comply with the Corrective Action Plan by submitting documentation to Dropbox on the last day of each month.

DWD Response:

EKCEP has met all the conditions of this CAP, and no further issues have been found. This finding has been resolved as of October 9, 2025.

Finding (2):

Missing Low-Income Eligibility Documentation

Issue(s):

Youth: Workforce Cases #003492639 and #003503859. Two (2) participants are showing in KEE Suite to be low income, a WIOA-2 was uploaded showing the participants made less than \$19 per hour. The WIOA-1 and WIOA-2 are stating low income, and annual calculations were not entered in KEE Suite per the WIOA 1-2 Reference Guide.

Citation(s):

WIOA 1-2 Reference Guide: Methods for Calculating Income: When calculating the amount of income in determining eligibility, use one of the following methods: Please show your work on a separate sheet and state the method used. Straight-Pay or Salary Method: The minimum number of pay stubs is two (2) stubs, if paid weekly, and one stub if paid bi-weekly, bi-monthly, or monthly. The applicant supplies a sample of pay stubs covering the most recent twelve months of family income. If upon reviewing the pay stubs, the intake worker determines that the wage information on the stubs is the same, i.e., there is no variation in the wages for any of the pay stubs submitted, calculate the income. Based upon the wages indicated on the appropriate number of pay stubs, multiply the gross income by the number of pay periods in six months. If the pay is weekly, multiply by 26 for a six-month gross income and multiply by 2 to obtain an annualized figure.

Instance(s):

2/45 (4%)

Required Action:

This is a repeat finding from PY22. LWDB must ensure the annual income calculation is completed and uploaded into KEE to satisfy the low-income eligibility requirement. In response to this finding, EKCEP area will be under a Corrective Action Plan (CAP) to address the violation of the WIOA Reference Guide: Methods for Calculating Income. LWDB must review all low-income eligibility documentation entered in KEE Suite for each active low-income participant. Every month thereafter, EKCEP area must create a list of all new active participant files that were reviewed for the month and submit this list to DWD, via Dropbox. The EKCEP area will need to self-attest and sign-off to the validity and accuracy of eligibility data input in KEE Suite. This CAP is effective March 28, 2025. The list mentioned above will be due on the last day of each month. This CAP will be ongoing for 6 months from the first date of submission.

LWDB Response:

EKCEP staff have reviewed the LLSIL policy and calculation methods with field staff. The Corrective Action Plan and the review of LLSIL entries have been discussed with staff. EKCEP staff are reviewing LLSIL entries on new and existing clients utilizing KEE Suite reports. Any incorrect LLSIL entries in KEE Suite have been corrected. EKCEP will comply with the Corrective Action Plan by submitting documentation to Dropbox on the last day of each month.

DWD Response:

EKCEP has met all the conditions of this CAP, and no further issues have been found. This finding has been resolved as of October 9, 2025.

Finding (3):

Workforce Cases Were Not Exited Properly or On Time

Issue(s):

Adult: Workforce Cases #003501770, #003502692, #003512976, #003514038, and #003524977. Five (5) Participants had workforce cases that were 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):

5/45 (11%)

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:

EKCEP staff developed and presented training regarding TEGL 10-16, Change 3 to all field staff. EKCEP provided this training to staff individually and in small groups. The training documents and signature sheets are attached to this response.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

OBSERVATIONS

Observation A:

Youth workforce cases #003501144 and #003499466 had completed tool testing but was not entered in the ISS.

Recommendation A:

It is highly recommended to enter all information that is required in the ISS to ensure no future findings/observations.

FISCAL MONITORING DETAILS

FINDINGS

Finding (1):

Travel overpayment.

Issue(s):

Employees received per diem for a one-day travel and the incorrect mileage rate was used for a few instances. The amount totaled to \$64.44. The description is below:

Description	Grant #	Overpayment
Overpayment of per diem. Drawdown 9/29/2023	273AD23	\$29.50
Overpayment of per diem. Drawdown 9/29/2023	273AD23	\$12.90
Overpayment of per diem. Drawdown 9/29/2023	273AD23	\$17.49
Reimbursed mileage at .44. State rate at this time was .43. Travel date: 2/26-27/24	273AD23	\$2.85
Reimbursed mileage at .44. State rate at this time was .43. Travel date: 2/15/24	273AD23	\$0.97
Reimbursed mileage at .44. State rate at this time was .43. Travel date: 2/27/24	273AD23	\$0.73
TOTAL		\$64.44

Citation(s):

200 KAR 2:006: Employees' reimbursement for travel (February 9, 2017) "Section 7. (3) Subsistence and incidentals. (a) Breakfast and lunch. A state officer or employee shall be eligible for reimbursement for subsistence for breakfast and lunch expenses while traveling in Kentucky, if authorized work requires an overnight stay and absence during the mealtime hours established by paragraph (e) of this subsection."

200 KAR 2:006: The mileage reimbursement rate for January 1, 2024 – March 31, 2024, was \$0.43.

Required Action:

LWDB must ensure that the requirements meet the state regulations to avoid any future questioned and/or disallowed cost. Per the response, received on December 18, 2024, via email, from the Director of Finance with EKCEP, the LWDB agreed that the amount of **\$64.44** 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 cover letter that includes the grant number the refund check should be applied to and the reason for this reimbursement. Once completed, it is requested to submit a copy of the check and cover letter with the LWDB Response.

LWDB Response:

EKCEP has completed a reimbursement utilizing non-WIOA funds. The reimbursement was completed on April 7, 2025, with check number 13333 in the amount of \$64.44. The cover letter and proof of reimbursement are attached to this response.
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DWD Response:

The Kentucky DWD received a copy of check number 13333 on April 30, 2025. Finding is resolved.
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OBSERVATIONS

Observation A:

Workforce case #003499547 had a miscalculation on a timesheet for a work experience. It was an oversight of a misprint.

Recommendation A:

It is highly recommended to verify all documentation is calculated correctly to ensure no future findings/observations and/or the potential of misuse of funds occur.

BEST PRACTICES

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

PROGRAM

- Titles of case notes are useful.
- Documents being titled is useful.
- MSGs were entered correctly.

FISCAL

- Very quick response to document requests during monitoring.
- Great professionalism and clear communication during monitoring.
- Responded very quickly to any questions with clarity.

WAGNER-PEYSER MONITORING

The Prestonsburg Kentucky Career Center was reviewed by the monitoring team, Donna Burke, on December 9, 2024. Donna Burke monitored Wagner-Peyser Act compliance in the Prestonsburg, Kentucky Career Center and met with Tonia Prewitt, Regional Program Manager and Trina Allen, Workforce Development Manager. One participant was randomly selected to 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 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 Prestonsburg Career Center, located at 686 North Lake Drive, Prestonsburg, KY, serve an average over a 102 walk-in customers per week. According to Mrs. Allen, the counts are captured by the front desk and calculated at the end of each day. This data captures all traffic that enters the center whether the customer is there for UI, job search, OVR, WIOA services, etc.

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), OSO, JVSG, and WIOA. Partner space is available for Adult Education, Job Corp, SNAP, and Senior Employment which are not onsite. A new VET representative will be beginning on December 16th and will be at the career center but not at the office daily due to other meetings in the area. They also partner with CSEP for the senior employment. This position is currently vacant.

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 all day on Mondays and Tuesdays. Upon entering the main lobby area, a receptionist to greet the customers and assists them with any questions and the purpose of his/her visit. The receptionist will then direct or call for that customer to the department he/she needs and will show them the resource area if there for UI purposes or job search. Once the information has been gathered, the associate providing that service requested will then greet the customer in the lobby. The staff share schedules to ensure coverage of the resource area is fully covered at all times. Customer wait time is generally less than 3 minutes. The television monitor in the waiting room displays partner information and workshops provided by the career center.

The resource area has twelve operational computers, two workstations are accessible for those with disabilities and for veterans, plus two interview rooms that are open to partners to use as well and 2 training rooms. The twelve computers are located in the center of the career center that are easily accessible to the customers.

Prestonsburg considered the “Hub”, hosts RESEA workshops every Tuesday from 10:00 AM – 11:00 AM, as needed. 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. A variety of workshops are offered every Wednesday with different topics weekly. Some examples are Cybersecurity, How to Ace an Interview and Employability Skills. Workshops are also held every Thursday from 1:30 PM to 3:00 PM at Drug Court. This is to assist those in the re-entry program to help with job search and other workshops the Career Center offers. A workshop has been designed and offered to the public covering

“Free Mental Health and First Aid Training Certification.” The following are included of what can potentially be earned throughout this workshop:

- Peer Support Certification
- Mental Health First Aid – gain the knowledge to provide initial help to people experiencing mental health issues.
- BLS CPR Certification
- Resume Assistance
- Kentucky Fair Chance Bonding – access to bonding services to enhance employment opportunities.

Two randomly selected customer was interviewed. The customers were visiting the Career Center for job search. Each customer stated that they didn’t have to wait. For one customer, this was his first time at this career center and the second time for the other customer. They both indicated everything was going great and the staff at the career center were very helpful. They had no recommendations to improve services at the Career Center at this time and that they do an excellent job.

Observation:

Training and Employment Notice 8-23 was issued on October 10, 2023, and it contains “File A Complaint” forms for the public. According to this TEN, it states, “By April 1, 2024, SWAs must distribute this notice and the attached posters to each one-stop center, ES office managers, as well as any interested and potentially interested stakeholders. By April 1, 2024, SWAs must also publish the posters on the ES website’s main page.”

Recommendation:

The above notice was not located in this career center upon entering. However, this was resolved before leaving the premises. It is highly recommended that the “File a Complaint” forms are displayed so that the public is aware of this assistance.

BEST PRACTICE

- The career center in Prestonsburg is a great center. The communication they have with the team, all the workshops they have developed are wonderful and very helpful to the community. Their main goal is serving the customers, and it shows.
- They have a great second chance outreach program to assist those in recovery and/or are incarcerated.
- This career center continuously creates workshops that help meet the needs of the community. They do a phenomenal job.
- This career center is always looking at ways for improvement, whether it would be in workshops or assisting the customers visiting the career center.

END OF REPORT