



EDUCATION AND LABOR CABINET

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

September 10, 2025

Michael Gritton, Workforce Director
KentuckianaWorks Local Workforce Development Area
410 West Chestnut Street, Suite 200
Louisville, KY 40202

Jonathan Westbrook, Chair
KentuckianaWorks Workforce
Development Board
CEO, East & Westbrook
Construction
Louisville, KY 40223

Sent via email to: michael.gritton@kentuckianaworks.org
jwestbrook@eandw.com

Mr. Gritton and Mr. Westbrook:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY23 Comprehensive Monitoring Report issued on February 3, 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

KENTUCKIANAWORKS LWDB

February 3, 2025

Monitoring of the KENTUCKIANAWORKS Local Workforce Development Area

The KENTUCKIANAWORKS Local Workforce Development Area was monitored by the monitoring team staff on February 3, 2025. A Wagner-Peyser visit was conducted on February 5, 2025, at the Louisville Career Center by Maria “Tess” Russell and Donna Burke. Department of Workforce Development (DWD) monitoring staff included Maria “Tess” Russell, Amanda Cummins, Lisa Burton 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 June 25, 2025. A brief review of monitoring was given by Maria “Tess” Russell, Amanda Cummins, Lisa Burton, and Donna Burke.

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

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

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 KENTUCKIANAWORKS’ 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 nine (9) findings and three (3) observations, and the financial monitor identified no findings and two (2) 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. Violation of DWD WIOA Case Note Policy 22-002
2. Measurable Skills Gain not recorded in KEE Suite
3. IEP/ISS Incomplete in KEE Suite
4. Service Program not entered in KEE Suite
5. Youth Objective Assessment Not Completed
6. Not Prepared for Monitoring
7. Missing WEX Timesheet
8. Missing Eligibility Documentation
9. Missing Verification of Payment for Supportive Service

Observation(s):

- A. Missing or late outcomes.
- B. Missing Components on Youth WEX Agreements.
- C. A failure to enter completed WEX Agreements into KEE Suite prior to requesting reimbursement of funds.

Financial Monitoring Summary

Finding(s):

No findings.

Observation(s):

- A. Missing WEX Agreements
- B. Missing Documentation

PROGRAM MONITORING DETAILS

FINDINGS

Finding (1):

Violation of DWD WIOA Case Note Policy 22-002

Issue(s):

Youth workforce cases #003502592, #003502663, #003502290, #003471758, #003480993, #003498405, #003502557, #003495129, #003473472, #003504398, #003489995, #003434589, #003502477, #003496919, #003497447, and #003494863. Sixteen (16) youth participants had monthly case notes entered that were not clear and lacked details. They were entered in KEE Suite beyond the ten (10) business day timeframe allowed. These workforce cases were missing case notes for the years 2023 and 2024 and were not entered until monitoring occurred in 2025. Out of these same 16 youth participants, 12 participants also had follow-up case notes entered beyond the ten (10) business day timeframe allowed. These workforce cases were missing case notes for the years 2023 and 2024 and were not entered until monitoring occurred in 2025.

Adult workforce cases #003496443 and #003498310. Two (2) Adult participants had monthly case notes entered in KEE Suite beyond the ten (10) business day timeframe allowed.

Adult workforce cases #003519282 and #00350926. Two (2) Adult participants had follow-up case notes entered beyond the ten (10) business day timeframe allowed.

DW workforce case #003506900 had monthly case notes and follow-up case notes beyond the ten (10) business day timeframe allowed.

Citation(s):

DWD WIOA Case Note Policy 22-002:

Case notes shall be entered for each customer in the state case management system of record documenting relevant information beginning with intake and continuing through case management, training, and follow-up services. Case notes shall be written at the time of the event or contact and entered into the case management system of record as soon as possible, but no later than 10 business days following the event or contact. Extenuating circumstances such as system unavailability may be grounds for a brief extension to enter case cases, and such extensions will be considered on a case-by-case basis.

The purpose of case notes is to provide a detailed description of an individual's participation in services. Case notes must be clear, relevant and useful. Effective case management practices include comprehensive case notes to detail intake, evaluations, participation, outcomes, service decisions, one-on-one meetings, achievements and follow-up services. Detailed case notes should individualize the customer and, at minimum, include the following information:

- the needs of the customer;
- history and details of the customer's situation, including both strengths and barriers;
- activities provided or planned (if applicable);
- brief description of how the customer will benefit from designated services;
- details of significant events;

- any need for modifications in the customer’s training or services;
- information provided verbally or electronically by service providers;
- customer’s progress toward goals;
- any need for additional services;
- any new information pertaining to customer’s employability; and
- verification of post-exit outcomes.

Instance(s):

21/29 (72%)

Required Action:

LWDB must adhere to the DWD WIOA Case Notes Policy 22-002. Monthly case notes must be detailed, tell a story, be relevant, be clear, and be entered in KEE Suite within ten business (10) days of contact with participant. A training must be given to all staff regarding the Kentucky Career Center WIOA Case Notes Policy 22-002. 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:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The WIOA service provider staff received training on case notes and the WIOA Case Notes Policy 22-002. The WIOA Adult team received training on Friday, July 25, 2025. The WIOA Youth team received training on Thursday, July 24, 2025. The presentation, case note training exercise, agenda, and sign-in sheet were submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

Finding (2):

Measurable Skills Gain not recorded in KEE Suite

Issue(s):

Youth workforce cases #003502663, #003495129, #003434589, and #003496919. Four (4) youth participants did not have measurable skills gains entered in KEE Suite. KentuckianaWorks stated on the youth program spreadsheet that the participant could not be reached, therefore, a measurable skills gain was not obtained. The measurable skills gain indicator is used to measure interim progress of participants. The measurable skills gain indicator is not an exit-based measure. It is intended to capture progression through the pathway.

Citation(s):

TEGL 10-16 change 2:

Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs: Measurable Skill Gains: The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. The measurable skill gains indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based

measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs and can help fulfill the vision for a workforce system that serves a diverse set of individuals with a range of services tailored to individual needs and goals. Depending on the type of education or training program, documented progress is defined as one of the following:

- a) documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;
- b) documented attainment of a secondary school diploma or its recognized equivalent;
- c) secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the state unit's academic standards; d) Satisfactory or better progress report, towards established milestones, such as a completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training; e) successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related bench marks such as knowledge based exams.

TEGL 10-16, Change 2 was referenced rather than Change 3 because the finding occurred prior to the Change 3 effective date of June 11, 2024. However, because TEGL 10-16, Change 3 is now in effect, training is required on this DOL Guidance.

Instance(s):

4/29 (14%)

Required Action:

LWDB must adhere to DOL's TEGL 10-16, Change 3: Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Core Programs. Training must be given to staff regarding the importance and the process of entering and completing all MSG information in KEE Suite. A sign-in sheet for this training, the training syllabus, and training documents must be forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The WIOA Youth service provider team received training on Measurable Skills Gains, MSG KEE Suite entry, and performance and data accountability on Thursday, July 24, 2025. The presentation, agenda, and sign-in sheet are submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

Finding (3):

IEP/ISS Incomplete in KEE Suite

Issue(s):

Youth workforce cases #003434589 and #003496919. Two (2) youth participants had incomplete individual service strategies (ISS) in KEE Suite. Workforce case #003434589 had an incomplete ISS

due to not including LMI, industry sector, and strengths. Workforce case #003496919 had an incomplete ISS due to not listing educational goals.

Citation(s):

DWD Kentucky Youth Manual 19-003:

Development of an Individual Service Strategy (“ISS”): The LWDB or youth program provider must develop an ISS, based on the objective assessment that specifies which of the 14 Program Elements are needed to assist the participant in meeting his/her educational and career goals. The objective assessment may be directly linked to one or more performance accountability measures for youth as specified in 20 CFR 671.155 and 34 CFR 463.155.

1. The ISS must include identification of appropriate career pathways including:
 - a. Educational goals;
 - b. Employment goals, including non-traditional employment, taking into consideration career planning and the results of the objective assessment; and
 - c. Appropriate achievement objectives and services for the participant.
2. The ISS is a living document and must be updated with each contact to reflect progress, status, and changes. ISS updates must coincide with case notes and services in KEE-Suite.
3. A new ISS is not required if a partner program has completed an ISS with the participant in the last six months and its use is deemed appropriate by the LWDB.
4. Youth programs must link participation and services of the individual to the individual service strategy and not the timing of youth service provider contract or program years.

Instance(s):

2/29 (7%)

Required Action:

LWDB must adhere to the DWD Kentucky Youth Manual, Section H: Youth Services, Part D. Training must be given to staff regarding the importance and the process of completing all sections of the ISS in KEE Suite. A sign-in sheet for this training, the training syllabus, and training documents must be forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The WIOA Youth Service Provider team received training on ISS/IEP and the Kentucky Youth Manual, Section H: Youth Services, Part D, on Thursday, July 24, 2025. The presentation, agenda, and sign-in sheet are submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

Finding (4):

Service Program not entered in KEE Suite

Issue(s):

Youth workforce case #003502663. One (1) youth participant had a WEX that was not entered under service programs in KEE Suite. Case note titled, work experience start date update created on 2/14/2025, states “The client started the work experience program on 7/25/2023. Service program cannot be input due to the client being in follow-up and exit”.

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 and 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.

Instance(s):

1/29 (3%)

Required Action:

LWDB must adhere to the DWD WIOA Data Entry Policy 22-001. Training must be given to staff regarding the importance and the process of entering all service programs in KEE Suite. A sign-in sheet for this training, the training syllabus, and training documents must be forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The WIOA Youth service provider team received training on the DWD Data Entry Policy and Service Program entry in KEE Suite on Thursday, July 24, 2025. The presentation, agenda, and sign-in sheet are submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

Finding (5):

Youth objective assessment not completed

Issue(s):

Youth workforce case #003494863. One (1) youth participant did not have an objective assessment completed at the time of eligibility. LWDB stated on the youth program monitoring spreadsheet, “The client did not complete the TABE test when they were in the Good Start class. This was overlooked in the enrollment process. She came to the SPOT to complete her TABE Test when the scores were found missing 2/17/25. The TABE score results were uploaded in the Notes & attachment section of her profile”.

Citation(s):

TEGL 21-16 WIOA Youth Operating Guidance:

The WIOA youth program design requires an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. Assessments must also consider a youth’s strengths rather than just focusing on areas that need improvement. As required in 20 CFR Section 681.290, “in assessing basic skills, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities.”

Instance(s):

1/29 (3%)

Required Action:

The LWDB must ensure that all youth are given an objective assessment as required by TEGL 21-16 WIOA Youth Operating Guidance. Training must be given to staff regarding the importance and the process of give all youth an objective assessment at the time of eligibility. A sign-in sheet for this training, the training syllabus, and training documents must be forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The WIOA Youth service provider team received training on Youth Objective Assessment and data accountability on Thursday, July 24, 2025. The presentation, agenda, and sign-in sheet are submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

Finding (6):

The LWDB was not prepared for monitoring. The LWDB did not submit requested documentation in a timely manner and provided records that were not appropriate based on DWD requests.

Issue(s):

The LWDB was notified that monitoring would begin on February 3, 2025. An opening call was held on February 3, 2025, and the LWDB was requested to submit documentation by February 27,2025. Documentation was received between March 6, 2025, through May 2, 2025. No extension was requested. Approximately 1,500 pages were submitted to the DWD in the month of March 2025, which were not responsive.

Citation(s):

Commonwealth of Kentucky Contract with the LWDB, executed on July 1, 2022, provides that the LWDB agrees to:

14. MOA Monitoring: Agree to GRANTS MANAGEMENT conducting on-site monitoring reviews as GRANTS MANAGEMENT deems necessary per program year. Such monitoring will include a review of the Second Party’s, Third Party’s and Fourth Party’s compliance with WIOA and applicable federal and state regulations and policies, this MOA, and budget items.

The review will further seek to determine the appropriateness of costs charged to this contract. *It is the responsibility of the appropriate party to this MOA to ensure appropriate records are made available for inspections by GRANTS MANAGEMENT monitors* (emphasis added) or officials of any other Agency with WIOA program oversight, i.e., U.S. Department of Labor. Such reviews will follow the GRANTS MANAGEMENT monitoring guidelines and time requirements for issuance, response and resolution of any adverse findings. If a monitoring finding is not resolved in the resolution process used by GRANTS MANAGEMENT, the stated parties agree to abide by 20 CFR 683.600-610, and to promptly settle any monitoring, fiscal or program exceptions by making direct payment or by any other method approved by GRANTS MANAGEMENT.

Instance(s):

Multiple Instances

Required Action:

The LWDB must be prepared for annual WIOA Monitoring, must adhere to response timelines by the DWD, and must upload only appropriate documents requested by the DWD. Training must be given to staff on the terms of the Commonwealth of Kentucky Contract, Section 14: MOA Monitoring. A sign-in sheet for this training, the training syllabus, and training documents must be forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The KentuckianaWorks team received training on the Commonwealth of Kentucky Contract, Section 14: MOA Monitoring and monitoring preparedness on July 17, 2025. The team also developed a process improvement plan to ensure timeliness and compliance during future monitoring, which includes the development of an internal SOP. The syllabus, calendar, and sign-in sheet are submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD received training documents on August 19, 2025. Finding is resolved.

Finding (7):

Missing WEX Timesheet

Issue(s):

Youth: Workforce case #003502290. One (1) participant was missing a timesheet for the pay period of 3-13-2024. The paystub was uploaded to KEE Suite, but LWDB stated, during a Teams call on April 23, 2025, that the timesheet for this pay period was missing. The participant made \$15 an hour and worked 4 hours for the pay period of March 13, 2024. This has resulted in a disallowed cost in the amount of \$60.00.

Citation(s):

Fair Labor Standards Act (FLSA): employers in Kentucky must maintain accurate records of employee hours worked and wages earned. While the Act does not prescribe a specific form for these records, they must include identifying information about each employee, as well as data regarding hours worked and wages paid. This information must be accurate.

Instance(s):

1/29 (3%)

Required Action:

The LWDB must ensure that all timesheets are completed and uploaded into KEE Suite to avoid any future questioned and/or disallowed cost. Per the response, received on April 23, 2025, via Dropbox, the LWDB agreed that the amount of **\$60.00** 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:

KentuckianaWorks has implemented a corrective action to strengthen internal controls over WEX statements. Moving forward, we will verify that all WEX statements are accurately entered and reviewed prior to issuing any reimbursements. Each accountant on the fiscal team has been granted access to KEE Suite to verify and confirm charges independently. This will ensure accuracy, transparency, and compliance in our expense tracking and reimbursement processes.

DWD Response:

The Kentucky DWD received a copy of check number 1285043 in the amount of \$60.00 on September 9, 2025. Finding is resolved.

Finding (8):

Missing Eligibility Documentation

Issue(s):

Youth: Workforce case #003489995. One (1) participant was missing proof of school status, which is an eligibility document for youth participants that is used to determine if the youth is an OSY or ISY. Proof of school status was requested via email on May 1, 2025. On May 6, 2025, LWDB responded via email that they were not able to locate the proof of school status for this participant. There was also not a WIOA-2 uploaded to KEE Suite that covered self-attestation for proof of school status.

Citation(s):

The definitions of an OSY or an ISY are contained at 20 CFR 681.210, 220. The DWD Kentucky Youth Manual 19-003: SECTION L: DOCUMENTATION FOR ELIGIBILITY:
LWDBs must ensure timely documentation is collected regarding eligibility determination. Attempts to secure documentation and outcomes must be recorded in KEE-Suite promptly and accurately.

General Requirements

A. LWDA service providers must use KEE-Suite for eligibility determinations for the WIOA Title I-B Youth Program and for data validation. The checklist in KEE-Suite identifies source documents, which are documents used to verify eligibility requirements. All eligibility documents may be uploaded into KEE-Suite.

B. LWDBs must ensure that reasonable attempts have been made to secure source documentation as identified in KEE-Suite.

C. The *WIOA Applicant Statement* may be used as permitted when the information is unverifiable or unreasonably difficult for the applicant to obtain.

For high-risk OSY*, the *WIOA Applicant Statement* is acceptable to allow upfront enrollment of the youth.

***High-risk OSY** means not having a high school diploma or HSE, and meeting the eligibility criteria as listed in SECTION J: Eligibility Determination.

Note: A determination that an OSY “Requires additional assistance to enter or complete an education program or to secure or hold employment, as defined by the LWDB” is not sufficient for determination that the OSY individual is high-risk. As such, the *WIOA Applicant Statement* may not be used for upfront enrollment for youth that meet only this eligibility criteria.

If the *WIOA Applicant Statement* was used to determine eligibility for youth enrollment, the LWDB should request additional documentation as needed for later data validation after the youth has begun to receive Youth services.

D. LWDBs must ensure all youth who are less than 18 years old have a *WIOA Applicant Statement* signed by the youth’s parent, guardian, or a responsible adult/collaborating witness. By signing the form, the youth’s parent, guardian, or a responsible adult/collaborating witness gives permission for the youth to participate in the program and verifies the information on the form is accurate.

Instance(s):

1/29 (3%)

Required Action:

LWDB must adhere to the DWD Kentucky Youth Manual 19-003: SECTION L: DOCUMENTATION FOR ELIGIBILITY. All eligibility documents, including proof of school status must be uploaded to KEE Suite at the time of eligibility. A training must be given to all staff regarding the Kentucky Youth Manual 19-003: Section L: Documentation for Eligibility. A sign-in sheet, syllabus, and documentation for this training must be completed and forwarded to DWD within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

KentuckianaWorks has completed the corrective action for this finding in accordance with the instructions outlined in this report. The WIOA Youth service provider team received training on Kentucky Youth Manual Section L: Documentation for Eligibility and Youth School Status on Thursday, July 24, 2025. The presentation, agenda, and sign-in sheet are submitted via email along with this report on July 25, 2025.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

Finding (9):

Missing Verification of Payment for Supportive Service

Issue(s):

DW: Workforce case #003506900. One (1) participant was missing the receipt and proof of payment for gas card issued on supportive service.

Citation(s):

Commonwealth of Kentucky Contract with the LWDB, executed on July 1, 2023, provides:

ADDITIONAL Department of Workforce Investment Terms and Conditions the Second Party, Third Party and Fourth Party shall:

15. ASSURANCES AND CERTIFICATIONS

m. Access to and Maintenance of Records:

6. Agree to maintain records, including case notes, in the Employ Kentucky Operating System (KEE SUITE) or any other system approved by the First Party, sufficient to identify the results of the service provided each individual and for use in evaluating the effectiveness of the total program, enabling verification that negotiated performance standards have been met as required. In addition, the stated parties will ensure all required data and case notes related to the responsibilities under this agreement are entered into KEE SUITE or any other system approved by the First Party at the time of service, or within ten (10) business days and shall submit programmatic, financial and other reports as required by the First Party.

Instance(s):

1/29 (3%)

Required Action:

To correct this finding, all missing documents that were requested by DWD must be uploaded to Dropbox or KEE Suite Participant File within 30 days of receipt of this report to attest this finding has been resolved.

LWDB Response:

The receipt and proof of payment for the gas card associated with Workforce case #003506900 for the DW participant have been uploaded to the Dropbox folder titled "PY23 KentuckianaWorks WIOA Monitoring." Please note that the process for obtaining a gas card supportive service differs slightly from the standard supportive service process. The service provider purchases a bundle of gas cards using non-WIOA funds. When a participant is approved for a supportive service gas card, the card is documented and provided to them. The documentation for this is then submitted to KentuckianaWorks for reimbursement as part of the monthly invoice. If you have any further questions, we would be happy to discuss this further.

DWD Response:

The Kentucky DWD accepts this response. Finding is resolved.

OBSERVATIONS

Observation A:

Missing or late outcomes.

Adult: Workforce cases #003496443, #003519282, #003529302, #003499696, #003499688, #003498310, #003500872, #003509261. Eight (8) Adult workforce cases had missing or late outcomes.

Per TEGL 10-16, Change 2: "Wages reported as \$0 will indicate that the participant was not employed in the second quarter after exit, thereby counting as a negative outcome in the

Employment Rate 2nd Quarter After Exit indicator and excluding that participant from the Median Earnings 2nd Quarter After Exit indicator. Examples of this include:

- Participants who have exited from a program and who have \$0 income.
- Participants who have exited a program and are in subsidized employment.
- Participants who have exited for any of the reasons listed in Attachment II, Tables A through C.

Recommendation A:

DWD recommends entering employment outcomes showing \$0.00 wages when no employment is documented. DWD recommends entering outcomes using supplemental data where applicable.

Observation B:

Missing Components on Youth WEX Agreements

All Youth WEX Agreements are missing required components which are listed in the DWD Kentucky Youth Manual. The missing components from the Youth WEX Agreements are as follows: The duration of the WEX, Remuneration, Tasks and Duties, Health and Safety standards, other conditions of the WEX, such as consequences of not adhering to the agreement, and a Termination clause.

The DWD Kentucky Youth Manual 19-003: LWDBs must ensure there is a written Worksite Agreement or contract between each employer offering the WEX to ensure compliance with WIOA and applicable regulations. The workforce site agreement must be maintained in the participant's file and include at a minimum: The duration of the WEX; Remuneration; Tasks and duties; Supervision; Health and safety standards; Identification of the academic and educational component, including how it will be provided; Other conditions of the WEX, such as consequences of not adhering to the agreement; and A termination clause.

Recommendation B:

The DWD Recommends that the LWDB revise their Youth WEX Agreements to include all required components.

Observation C:

A failure to enter completed WEX Agreements into KEE Suite prior to requesting reimbursement of funds.

Youth: Workforce Cases #003480993 and #003502663. Two (2) participants are missing WEX Agreements. This was verified by the LWDB via email, dated May 13, 2025. The email stated, "Unfortunately, we were not able to locate the WEX agreements".

Recommendation C:

The DWD recommends that the LWDB ensure all WEX agreements are completed and uploaded to the State System of Record, prior to submitting a request for reimbursement of funds, to prevent future findings or disallowed costs.

The DWD Kentucky Youth Manual 19-003 states, "LWDBs must ensure there is a written Worksite Agreement or contract between each employer offering the WEX to ensure compliance with WIOA and applicable regulations".

FINANCIAL MONITORING DETAILS

OBSERVATIONS

Observation A:

Missing WEX Agreements

Workforce Case #003504554 had a missing WEX Agreement. This was agreed upon and verified by the LWDB via email, dated May 13, 2025. The email stated, “Unfortunately, we were not able to locate the WEX agreements”.

Recommendation A:

The DWD recommends that the LWDB ensure all WEX agreements are completed and uploaded to the State System of Record to prevent future findings or disallowed costs.

The DWD Kentucky Youth Manual 19-003 states, “LWDBs must ensure there is a written Worksite Agreement or contract between each employer offering the WEX to ensure compliance with WIOA and applicable regulations”.

Observation B:

Missing Documentation

Paystubs for workforce case #003504554 were requested and not all were provided. Also, all agendas for travel were not received.

Recommendation B:

It is highly recommended that all necessary documentation be entered into the State system of record to avoid the potential of any findings and/or questioned cost.

WAGNER-PEYSER MONITORING

The Louisville Kentucky Career Center was monitored by the monitoring team member, Maria “Tess” Russell and Donna Burke on February 5, 2025. The team met with Monica Collins, Workforce Development Manager and Jana Martin-Reed, Regional Program Manager. Two randomly selected customers were 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 Louisville Career Center, located at 600 West Cedar Street, Louisville, KY, serve an average of 400 customers a month. This is a standalone Wagner-Peyser career center that consists of 16 Wagner-Peyser staff and three RESEA. The local partners at this location are Office for the Blind (OFB)/Office for Vocational Rehabilitation (OVR) and three Veteran Representatives where one is also the LVER of this career center.

The Career Center is housed in a three-story building and is located on the second floor. It had visible signage and the standard operation hours are from 8:00 a.m. to 4:30 p.m. with the busiest times on Mondays and Tuesdays all day and then on Wednesday afternoons. Upon entering the Career Center from the front, a security guard is sitting on the left and then upon entering the lobby, customers can approach the reception desk where basic identification information is obtained and asked a few questions regarding whether this is their first visit to the center, if they have an appointment, what type of services they are seeking as well as Veteran status. Veterans have a priority. Data is captured by the receptionist and written on a checklist and then the total per request is calculated at the end of each day. That information is then given to the workforce development manager at the end of each day. Customers can sit in the waiting area which has two operable television monitors that display information such as items required for requesting to draw unemployment insurance (UI), responsibilities after drawing UI, and offerings from the Career Center. Customer wait time is generally less than 10 minutes in the seating area. If the customer is needing to apply for unemployment or attempt to resolve a UI claim, they are sent on back to the resource room where a resource assistant is available for any questions and/or computer aid. The resource center has three assistants to meet the needs of the customers. If more help is needed, other Wagner-Peyser staff will assist to help meet the requests. A stand with information regarding resources, services and workshops are also available to customers on an informational board alongside the Veteran board. Another board is available for job seekers that shows fliers from companies that are currently hiring.

The resource area has 27 operational computers with four that are wheelchair accessible workstations, two training rooms, five interview rooms and cubicles which are utilized for Employer interviews with customers. Two smaller conference rooms are also available for trainings and staff meetings.

The Louisville Career Center, considered the “Hub”, hosts a weekly RESEA fair held on every Tuesday from 10:00 a.m. until everyone in attendance leaves prior to 4:30 p.m. They normally have about 30 customers in attendance.

A job fair was held on January 22, 2025, from 10:00 a.m. to 2:00 p.m. They had 30 employers in attendance along with 202 job seekers. The business service representative follows up with the employers to obtain information on how many were hired and if that individual is still employed with that company. Another job fair was planned for the month of April. The exact date was tentative due to research is required to ensure the career center is not overlapping with another organization's job fair. The center conducts quarterly job fairs.

The business service representative conducts outreach to build partner relationships by cold calling, emailing and visiting businesses. Flyers are displayed of upcoming events in the career center and are also given to the one-stop operator and business service representative to assist in distributing outreach information. They also attend chamber meetings and board meetings to maintain and/or build partnerships and to display information of upcoming events being held at the career center.

Two randomly selected customers were interviewed. The first customer was visiting the Career Center to file an Unemployment Claim. This was the participant's first visit to this Career Center. He stated the staff was great and he had no recommendations. The second customer was job searching. He stated he did not have any computer skills and had to come into the center for assistance. His complaint was how everything had to be done electronically now, and it makes it harder on the older population when job searching. He said the staff was great and didn't have any recommendations at this time. He was informed of the upcoming job fair in April, if he hadn't found employment.

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. The File A Complaint documents were not on display upon entering the center. This issue was resolved prior to departure. It is highly recommended to display the "Complaint" posters to comply with the required regulations for the public.

END OF REPORT