
WIOA Comprehensive Monitoring Review

TENCO LWDB

November 4, 2024

Monitoring of the TENCO Local Workforce Development Area

The TENCO Local Workforce Development Area was monitored by the monitoring team staff on November 4, 2024. A Wagner-Peyser visit was conducted on November 7, 2024, at the Morehead Career Center was conducted by 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 held on December 10, 2024. A brief review of monitoring was given by Aveana Jackson, 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 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 four (4) findings and one (1) observation, and the financial monitor identified no 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. Overpayment of WEX
3. Violation of KCC Data Entry Policy
4. Violation of Local Case Note Policy

Observation(s):

- A. Underpayment to Participant

Financial Monitoring Summary

Finding(s):

No findings.

Observation(s):

No observations.

PROGRAM MONITORING DETAILS

FINDINGS

Finding (1):

Incomplete ISS

Issue(s):

Youth: Workforce Case #003527474 and Workforce Case #003498598. Two (2) participants had an incomplete ISS due to not entering tool test results. Workforce Case #003527474 was also missing short and long-term goals.

Citation(s):

TENCO Workforce Development Board Policy No. 47:
WIOA requires an objective assessment, evaluation, and/or interview with each Adult, Dislocated Worker, and Youth customer to be completed prior to enrollment in WIOA services. This includes a review of basic/academic skills, occupational skills, educational history, work history, employability skills, interests, and barriers to employment.

The assessment process may include the use of multiple methods and tools while the individual is enrolled in WIOA. The ongoing assessment process must support engagement of the individual and ensure that the Individual Employment Plan supports training (youth) and/or employment outcomes.

Assessment results must be recorded in the State authorized case management/data system. Information recorded includes but is not limited to the type of assessment used, name of assessment (if applicable), and results of assessment.

Part 681 – Youth Activities Under Title I of the Workforce Innovation and Opportunity Act
*“§ 681.420 - The design framework services of local youth programs must:
...(2) Develop, and update as needed, an individual service strategy based on the needs of each youth participant that is directly linked to one or more indicators of performance described in WIOA sec. 116(b)(2)(A)(ii), that identifies career pathways that include education and employment goals, that considers career planning and the results of the objective assessment and that prescribes achievement objectives and services for the participant;”*

Instance(s):

2/49 (4%)

Required Action:

LWDB must adhere to the TENCO Workforce Development Board Policy No. 47 a Part 681 – Youth Activities Under Title I of the Workforce Innovation and Opportunity Act “§ 681.420. All IEP’s/ISS must be entirely completed. A training must be given to all staff regarding the TENCO Workforce Development Board Policy No. 47 a Part 681 – Youth Activities Under Title I of the Workforce Innovation and Opportunity Act “§ 681.420. A sign-in sheet for this training and 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:

Training was conducted on 1/15/2025. Agenda, documents, and sign-in sheet are attached.

DWD Response:

DWD accepts this response. Finding has been resolved.

Finding (2):

Overpayment of WEX

Issue(s):

Youth: Workforce Case #003501120. Workforce case #003501120 participated in a work experience and it was discovered for the pay period of 7/2/2023 thru 7/15/2023, the participant worked eight hours and was reimbursed for 16 hours. The participant earned \$8.50 per hour and with this question which results in a questioned cost of \$68.00. The payment was paid out of grant #274YT23.

Citation(s):

In reference to the work experience agreement, it states, "The participant will receive compensation for all hours of participation verified by the workplace and authorized by the contractor."

With the timesheet provided, the participant only worked eight hours for the timeframe noted above.

Instance(s):

1/49 (2%)

Required Action:

LWDB must ensure that the requirements are met within the work experience agreement and the request for reimbursement is double checked to avoid any future questioned/disallowed costs. Per the response in the monitoring spreadsheets received from the workforce director on November 20, 2024, we are in agreement the amount of **\$68.00** is a disallowed cost. This amount will need to be submitted back to the State using **non-federal funds**. Please submit this reimbursement to the following address within 30 days of receiving this report:

Attention: Aveana Jackson
500 Mero Street, 414NC
Frankfort, KY 40601

Once completed, it is requested to submit a copy of the check to the monitoring team or include a copy with this report once submitted.

LWDB Response:

A copy of the check dated 12/10/24 for \$68.00 was emailed on 12/10/24 (date I received a copy).

DWD Response:

DWD accepts this response. Finding has been resolved.

Finding (3):

Violation of KCC Data Entry Policy

Issue(s):

Youth: Workforce case #003500242. One (1) participant had a service program start date of 7/31/2023 entered in KEE Suite, however, according to WEX timesheets, this participant started their service program on 7//7/2023.

Citation(s):

KCC 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):

1/49 (2%)

Required Action:

LWDB must adhere to the Kentucky Career Center Data Entry Policy. Data 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 Kentucky Career Center Data Entry Policy. A sign-in sheet for this training and the training syllabus/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:

Training was conducted on 1/15/2025. Agenda, documents, and sign-in sheet are attached.

DWD Response:

DWD accepts this response. Finding has been resolved.

Finding (4):

Violation of Local Case Note Policy

Issue(s):

Youth: Workforce Case #003499918 and #003500242. Two (2) participants did not have case notes entered within 10 days of contact with participant. After staff changes, a local review of files identified that notes were not entered timely and therefore were entered at the time this was discovered.

Adult: Workforce Case #003480839. One (1) participant did not have case notes entered within 10 days of contact with participant. Identified one note 'February Exit' created on 3/27/24 that was entered more than ten days after the activity occurred.

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. Case notes should be added within 10 days of a service, activity and/or contact made with the customer and/or on behalf of the customer. Case notes should be relevant to the customer's training plan, services enrolled, and the desired employment and/or educational outcome. Monthly contact is required and if not obtained, a case note detailing the attempts to contact should be included.

Instance(s):

3/49 (6%)

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. A training must be given to all staff regarding the TENCO Workforce Development Board, Policy Number 46 – Case Note & Data Entry. A sign-in sheet for this training and 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:

Training was conducted on 1/15/2025. Agenda, documents, and sign-in sheet are attached.

DWD Response:

DWD accepts this response. Finding has been resolved.

OBSERVATIONS

Observation A:

One youth participant, Workforce Case #003501715 was underpaid for a WEX by 0.5 hours at a pay rate of \$8.50 an hour. This totaled a \$4.25 underpayment to participant.

Recommendation A:

DWD recommends that TENCO LWDB review all timesheets and make sure that timesheets match the paystubs for the hours worked before participants are paid. This will help ensure all participants are paid correctly.

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.
- Monthly case notes are entered timely with detailed notes. KEE Suite issues or file issues were documented completely.
- Titles of case notes are useful.
- Documents being titled is useful.
- Short and long-term goals were listed in the IEP/ISS regardless of short or long-term training.

FISCAL

- Quick response to document requests during monitoring.
- Great and clear communication during monitoring.
- Responded very quickly to any questions.

WAGNER-PEYSER MONITORING

The TENCO Kentucky Career Center was reviewed by a monitoring team member, Donna Burke, on November 7, 2024. Wagner-Peyser Act compliance was monitored at the Morehead Kentucky Career Center and met with Tonia Prewitt, Regional Program Manager. No customers were selected for an interview for it was in the afternoon and the traffic flow was low.

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 51 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 one WIOA counselor, one One-Stop Operator, one Business Service, one WIOA Staff Manager, one Resource Room Assistant, eight Wagner-Peyser staff, one JVGS/CDO, and one Regional Program Manager. The partners onsite are CDO, OFB/OVR, VETS, WIOA, and Senior Employment, which is currently vacant. The career center partners with Goodwill to seek this position being filled. Job Corp is onsite monthly and/or sometimes, twice a month. The adult ed rep comes to the center every Tuesday and assists with needed resources. The center was just given permission and approval to have one adult education employee onsite. The OSO position was recently filled and is housed at the Morehead Career Center. The OSO has 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 – 4:30 PM on Mondays and 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 3 - 5 minutes. There are three round tables and chairs along the walls for seating. A television monitor is in the waiting room displaying information of interest to career center customers that shows information about partnering agencies, on-demand careers, and UI information. A large whiteboard is in the waiting room that shows all the jobs available. A monitor is available at the front desk that shows resume tips, phone numbers, career center services, etc. A KCTCS kiosk stand with information

regarding resources at the colleges is also available to customers in the waiting area. One area is dedicated to the Veterans and is very professional to assist in meeting the requested needs. The resource area has thirteen 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 twelve computers are located within a large cubicle to enhance the privacy of the customers. There is another resource room located behind the front desk for those seeking employment and/or UI assistance. Twelve computers were available, which were all operable, with two for handicap assistance. This resource room can also be used as an overflow when job fairs are being conducted at this career center. CDO and Wagner-Peyser staff have cubicles that sit along this resource room to make themselves available to the customers in need of assistance at the computers. 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.

The Morehead Career Center hosted several job fairs onsite from January thru April 2024 for Huck's where 65 people were hired. The career center also partnered with Marshall's during the month of May 2024 to provide job fairs. These two companies were new to Morehead, Kentucky.

The business service team has quarterly meetings to meet with other business partners to discuss potential new partnerships, outreach, and job fairs. The business service also attends the Chamber Re-Entry meetings to ensure others at this meeting that the career center is there to help and to partner with. RESEA workshops are conducted every Tuesday from 10:00 AM – 11:30 AM. Partners and employers are invited to this event.

The TEN 08-23 "File A Complaint" forms in English and Spanish was located in the waiting room on the bulletin board which was very neat and clean. These forms were very visible and at eye level.

No customers were available for interviewing. This visit was conducted late in the afternoon during slow business hours.

BEST PRACTICE

- This career center does an excellent job on building partnerships and providing job fairs for the community.
- Very well organized and professional.

END OF REPORT