



EDUCATION AND LABOR CABINET

Andy Beshear
Governor

**Department of
Workforce Development**

Jamie Link
Secretary

January 27, 2023

Dennis J. Courtney, WKWB Chair
Law Office of Dennis J. Courtney
104 S. 15th St.
Murray, KY 42071

Sheila Clark, Director
Western Kentucky Local Workforce
Development Area
300 Hammond Drive
Hopkinsville, KY 42240

Dear Mr. Courtney and Ms. Clark:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY20 Comprehensive Monitoring Report issued on November 15, 2022. While these responses have been accepted, the Cabinet reserves the right to review files of this cohort, as well as all participant files for ongoing compliance purposes.

If you have any questions, please contact Jim Beyea via email at jim.beyea@ky.gov or oetmonitoringteam@ky.gov.

Sincerely,

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

Jim Beyea
Assistant Director

Attachments: Comprehensive Compliance Review

Comprehensive WIOA Programmatic Review

WEST KENTUCKY LWDB

August 17, 2022

Monitoring of the WEST KENTUCKY Local Workforce Development Area

The WEST KENTUCKY Local Workforce Development Area was monitored by the monitoring team staff on August 17, 2022. Department of Workforce Development (DWD) monitoring staff included Anita Doster, Amanda Cummins, and Donna Burke. The team reviewed Workforce Innovation and Opportunity Act (WIOA) Title 1B programs, specifically Adult, Dislocated Worker (DW), and Youth relating to Program Year 2020. Also, a comprehensive financial review was conducted of all referenced programs.

A closing conference was held on September 23, 2022. A brief review of programmatic monitoring was given by Jim Beyea, Anita Doster, 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 WEST KENTUCKY'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 WEST KENTUCKY 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 no observations, and the financial monitor identified no findings or observations during the PY20 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 Follow-Up Policy
2. Violation of WKWB Dislocated Worker Policy
3. Local WKWB Follow-Up Policy for Adults and Dislocated Workers needs clarification/revision

Observation(s):

No observations.

Financial Monitoring Summary

Finding(s):

No findings.

Observation(s):

No observations.

PROGRAM MONITORING DETAILS

FINDINGS

Finding (1):

Violation of Follow-Up Policy

Issue(s):

Youth: Workforce Case #002689630, #001960430, and #001957424. Three youth participants had monthly follow-ups that were entered beyond the 10-day timeframe for entering data into KEE Suite.

Citation(s):

According to LWDB Follow-Up Policy, PG 1: All WIOA Title I Youth participants must be provided a minimum of 12 months of follow-up services after completion of participation. Follow-up services are activities after completion of participation to monitor youths' success during their transition to employment and further education and to provide assistance as needed for a successful transition. This requirement includes a minimum of at least a monthly attempt to contact and provide follow-up services, unless the participant declines such services in writing. Follow-up service begins automatically in the KEE-Suite system following the last expected date of service in the WIOA Title I-B Youth Program (and other KCC partner programs in which the participant is co-enrolled when no future services are scheduled). Monthly Follow-up services must be recorded in case notes in KEE-Suite promptly and accurately to ensure expediency of services. Case notes in the system must contain documentation substantiating follow-up contact with the participant, including follow-up attempts. This may include, but is not limited to, a letter, an e-mail message or case notes based on an actual conversation, either in person or by telephone. Follow-up attempts with the individual participant must be made and documented in case management system of record, as provided, during the 12-month requirement. (This is separate from any follow-up contact with the employer for verifying employment or outcomes.)

Instance(s):

3 of 45 (7%)

Required Action:

LWDB must ensure case managers complete follow-up services in a timely manner and according to LWDB Policies. A training must be given to staff regarding the LWDB Follow-Up 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 provided June 29, 2022 to all youth providers. During the training, we discussed follow-up services, case notes, and the importance of the case notes being entered immediately. See attached agenda and sign-in sheet.(Attachment A) I emailed the current provider that had two of the issues from our initial call (see Attachment B). There are new staff in place for the other youth provider as of July 1, 2022 and we are continuing to work with them in all areas.

DWD Response:

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

Finding (2):

Violation of WKWB Dislocated Worker Policy

Issue(s):

Dislocated Worker: Five Dislocated Workers were missing monthly contact during ITA Training. Workforce Case #001453965 had no contact in August 2020, #000985405 had no contact in August 2020, #001259297 had no contact between 6/29/20 and 9/15/20, #000462846 had no contact in Nov, Dec 2020 and Jan, April 2021, #001335414 had no contact in Nov, Dec 2020, and Jan 2021.

Citation(s):

WKWB Dislocated Worker Policy:
3.15 Procedures for Monitoring Attendance
a. WIOA Career Coaches should maintain regular contact with customers (at a minimum monthly) as a way to verify that they are regularly attending their training.

Instance(s):

5 of 45 (11%)

Required Action:

Participants must be contacted monthly to verify they are regularly attending their training, per local policy. A sign off confirmation must be submitted to DWD within 30 days of the receipt of this report to attest this finding has been resolved.

LWDB Response:

We emailed all Direct Service Provider Staff regarding the local DW policy section 4.15 (a), Procedures for Monitoring Attendance. See Attachment C.

DWD Response:

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

Finding (3):

Local WKWB Follow-Up Policy for Adults and Dislocated Workers needs clarification/revision

Issue(s):

Local WKWB Follow-Up Policy for Adults and Dislocated Worker program participants states “Monthly Follow-up services must be recorded in case notes in KEE Suite promptly and accurately to ensure expediency of services.” However, per the email communication on 10/7/22 from the Training/Data Specialist, Adult and Dislocated Worker follow-up is at a minimum quarterly.

Citation(s):

WKWB Follow-Up Policy:
Monthly Follow-up services must be recorded in case notes in KEE-Suite promptly and accurately to ensure expediency of services. Case notes in the system must contain documentation substantiating follow-up contact with the participant, including follow-up attempts. This may include, but is not limited to, a letter, an e-mail message or case notes based on an actual conversation, either in person or by telephone. Follow-up attempts with the individual participant must be made and documented in case management system of record, as provided, during the 12-month requirement. (This is separate from any follow-up contact with the employer for verifying employment or outcomes.)

Instance(s):

Broad

Required Action:

LWDB must review and revise WKWB Follow-Up Policy to reflect quarterly follow-up for Adults and Dislocated Workers and submit revisions within 30 days of the final report acceptance.

LWDB Response:

The Follow-up Policy was revised and approved by the WKWB on December 2, 2022. See Attachment D

DWD Response:

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

FINANCIAL MONITORING DETAILS

***No findings and/or observations discovered for PY20 WIOA monitoring.

END OF REPORT