



EDUCATION and WORKFORCE DEVELOPMENT CABINET
Department of Workforce Investment

Andy Beshear
Governor

Mary Pat Regan
Deputy Secretary

Office of the Secretary
500 Mero Street, 4th Floor
Frankfort, KY 40601
Phone 502-564-0372

Jacqueline Coleman
Lieutenant Governor

Kish Cumi Price, Ph.D.
Commissioner

June 20, 2022

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

Amy Glasscock, Director of Workforce Services
Bluegrass Local Workforce Development Area
699 Perimeter Drive
Lexington, KY 40517

Dear Mr. Dougherty and Ms. Glasscock:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY20 Comprehensive Monitoring Report issued on May 5, 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 at jim.beyea@ky.gov or email at oetmonitoringteam@ky.gov.

Sincerely,

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

Jim Beyea
Assistant Director

Attachment(s): PY20 Comprehensive Compliance Review



Comprehensive Review

BGADD LWDB

January 24, 2022

Monitoring of the BGADD Local Workforce Development Area

The BGADD Local Workforce Development Area was monitored by the monitoring team staff on January 24, 2022. Department of Workforce Investment (DWI) 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.

The closing conference was held on March 28, 2022. A brief review of 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 BGADD 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 BGADD 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 two (2) findings and three (3) observations during the PY 2020 Comprehensive Monitoring Review. The financial monitor identified no findings and one (1) observation. 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

Finding(s):

1. Missing Employment Information
2. Missing Monthly Case Notes

Observation(s):

- A. Incomplete registration in KEE Suite
- B. Incorrect use of forms
- C. Improperly stored eligibility documents at time of monitoring

Financial Monitoring

Finding(s):

No Findings.

Observation(s):

- A. Missing MapQuest in Work System

Program Monitoring Details

Findings:

Finding (1): Missing Employment Information

Issue(s):

1. Adult: Workforce Case #001774892, #002819322, and #002410660. Three participants were missing employment information such as wages. Case notes state that employment was verified or that the counselor attempted to verify employment but other required employment information per BGADD policy was not captured in case notes or under outcomes tab in KEE Suite.
2. DW: Workforce Case #001474563 was missing employer and wage information for position started 2/8/21. Even though the participant had not secured the preferred Lineman position, all employment must be recorded in Employment Outcomes. Workforce Case #001885887 – Quarterly outcomes were documented in Case Notes, but Quarterly Outcomes were not set-up under Outcomes tab. Case Notes state the Outcomes could not be set-up because Workforce Case was in Active mode (CDL training ended 11/9/20 and should have been exited). LWDB has requested training in the Outcomes, Exiting, and Follow-Up areas as well as a training manual.

Citation:

Follow-up BGADD Policy # BGWIOA-R20-O20, Follow-Up, states that follow-up services must be provided to participants for up to 12 months after the first day of employment.

- a. Staff must contact participant within 30 days of completion of training or support service to confirm employment status.
- b. If participant is employed, staff MUST obtain the participant's new job title, wage, employer name, employer address, and employer phone number.
- c. Staff will contact employer to confirm that participant is employed.
- d. Staff will document in state-directed system the confirmation of employment.
- e. Upon confirmation of employment the participant and the participant's employer must be contacted no less than every 90 days from the first day of employment.

Instance(s): 5/60 (8%)

Required Action:

LWDB must ensure that all employment information such as employer name, address, phone number, and wages are captured in case notes or under the outcomes tab in KEE Suite, according to BGADD Follow-Up policy. Training must be administered to staff on entering employment outcomes into KEE Suite. Training information and sign in sheet must be submitted to the monitoring team within 30 days of the receipt of this report to attest this finding has been resolved.

LWDB Response:

WF# 001774892: LWDA gathered the information available to verify participants employment data, however salary information was not provided. THE LWDA realizes HR departments are not allowed to provide wage data and have updated the follow up policy removing the requirement of wage from the follow up policy. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

WF# 002819322: LWDA gathered the information available to verify participants employment data, however salary information was not provided. THE LWDA realizes HR departments are not allowed to provide wage data and have updated the follow up policy removing the requirement of wage from the follow up policy. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

WF# 002410660: LWDA gathered the information available to verify participants employment data, however salary information was not provided. THE LWDA realizes HR departments are not allowed to provide wage data and have updated the follow up policy removing the requirement of wage from the follow up policy. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

WF#: 001474563: LWDA gathered the information available to verify participants employment data, however salary information was not provided. THE LWDA realizes HR departments are not allowed to provide wage data and have updated the follow up policy removing the requirement of wage from the follow up policy. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

WF# 001885887: Due to system wide issue WF case remained active until 11/15/2021, the last staff assisted activity was entered into Kee Suite system on 1/27/2021 at the time the participant exited to employment. Case note timestamped 2/4/2021 12:52pm documents the issue, however with sprint updates the issue of workforce cases remaining active well after the last staff assisted activity has been entered appear to be resolved.

DWI Response:

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

Finding (2): Missing Monthly Case Notes

Issue(s):

1. Adult: Workforce Case #002819322, #001984023, and #001069615. Three participants were missing monthly case notes.

Citation:

Case Notes BGADD Policy # BGWIOA-R19-O10 states that case notes must: Show the frequency of participant contact but be at least once a month for active participants and those who are in training and 90 days for those participants in follow-up. If the participant has not been contacted on a regular basis, staff must document why.

Instance(s): 3/60 (5%)

Required Action:

LWDB must ensure that all case notes are completed monthly in KEE Suite for active participants according to BGADD policy. Training must be administered to staff in regard to LWDB Case Note policy #BGWIOA-R19-O10. Training information and sign in sheet must be submitted to the monitoring team within 30 days of the receipt of this report to attest this finding has been resolved.

LWDB Response:

WF# 002819322: The LWDA acknowledges the missing case notes and have discussed the importance of documenting interactions with participants. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

WF# 001984023: The LWDA acknowledges the missing case notes and have discussed the importance of documenting interactions with participants. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

WF# The LWDA acknowledges the missing case notes and have discussed the importance of documenting interactions with participants. The LWDA is administering an all staff training June 6, 2022 to train all DSP staff on all policies.

DWI Response:

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

Observation(s):

Observation A:

Youth: Workforce Case #002002361, #002429096, and #000411937. Adult: Workforce Case #001790718, #001899804, and #002605946. Household Information is incomplete under Registration tab.

Recommendation A:

LWDB should ensure when registering new participants into the system and before submitting for approval that all information is accurate and complete for this will aid in safeguarding against any disallowed or questioned cost.

LWDA Response:

WF# 002002361: This participant is a parenting youth eligibility documentation was uploaded on 11/12/2020 1:20 pm household income is not a requirement of WIOA youth eligibility for a parenting OSY.

WF# 002429096: This participant is a high school dropout; youth eligibility documentation was uploaded on 11/23/2020 2:53 pm household income is not a requirement of WIOA youth eligibility for a High school dropout OSY.

WF# 000411937: This participant is a high school dropout, youth eligibility documentation was uploaded on 2/25/2019 7:55 am household income is not a requirement of WIOA youth eligibility for a High school dropout OSY.

WF# 001790718: Case note timestamped 8/13/2020 8:42 pm states participant is unemployed, case note timestamped 7/21/2020 4:53 pm states due to medical issues was no longer able to gain employment in his previous career field. WIOA law does not require all Adult participants to be High Priority in order to receive WIOA services.

WF# 001899804: Case note timestamped 11/4/2020 12:47 pm states participant is unemployed, case note timestamped 11/4/2020 12:22 pm states participant is a resident of a sober living facility and has a criminal background. WIOA law does not require all Adult participants to be High Priority in order to receive WIOA services.

WF# 002605946: Case note timestamped 1/14/2021 1:44pm states participant is high priority, document uploaded on 1/12/2021 1:48 pm shows SNAP benefits proof. While this participant is 70% LLSIL, Local priority, and Statutory Priority, the LWDA provided proof through the SNAP benefits documentation all information has been completed that is required under policy 16-006 Local areas must record the priority of service category in the state's case management system of record. Available participant characteristics fields, including public assistance, low income, and basic skills deficient, must be selected in the case management system. Veteran's priority must be recorded in case notes and recorded in the case management system of record.

Observation B:

Incorrect use of forms with Dislocated Workers: Release of Information form was utilized to verify Unemployment Insurance for participants.

Recommendation B:

LWDB should instruct case managers to utilize KEWES UI B4 screen to verify Unemployment Insurance for participants. After the monitoring closing call, LWDB provided copies of UI B4 for the monitored Dislocated Worker participants. Moving forward, a copy of UI B4 screen must be saved in KEE Suite Documents as verification of Unemployment Insurance at the time of enrollment.

LWDA Response:

The first time the LWDA was informed the KEWES UI B4 screen was required for DW verification was during the monitoring call. We have used the UI Release of Information form for 17 years for DW verification. If the LWDA would have been aware of the state monitoring team required that specific page the LWDA would have made sure the document was in the hard file and uploaded into the DMS. The LWDA has provided guidance to the DSP and has made the KEWES UI B4 a required document to be maintained in WF case file for DW eligibility. The LWDA request an updated WIOA 1 and 2 reference guide showing eligibility documentation required to be uploaded and documentation required to be uploaded throughout the workforce case lifecycle.

Observation C:

Dislocated Worker: Bluegrass stored paper WIOA-1 and/or supporting eligibility verification documents for 8 participants outside of KEE Suite. In April 2022, documents were scanned and uploaded to Dropbox as proof of eligibility. Workforce Case #'s 001204702, 001603180, 001561357, 001308382, 001728550, 000014527, 001474563, 001263275.

Recommendation C:

LWDB must ensure that all WIOA participants are enrolled in KEE Suite and all verification and eligibility documents are scanned and saved in KEE Suite prior to providing WIOA services.

LWDA Response:

WF# 001204702: An abundance of system wide issues were connected to this WF case as documented in case notes timestamped 4/28/2020 1:49 pm; 5/1/2020 7:57am; 5/4/2020 11:17 am none of the issues could be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

WF# 001603180: A system issues connected to this WF case as documented in case notes timestamped 7/20/2020 3:17 pm the issue could not be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

WF# 001561357: A system issues connected to this WF case did not allow LWDA to go back into the system and edit the Other- Explain this issue could not be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

WF# 001308382: A system issues connected to this WF case did not allow LWDA to go back into the system and edit the Other- Explain this issue could not be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

WF# 01728550: A system issues connected to this WF case did not allow LWDA to go back into the system and edit the Other- Explain this issue could not be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

WF# 001474563: A system issues connected to this WF case did not allow LWDA to go back into the system and edit the Other- Explain this issue could not be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

WF# 001263275: A system issues connected to this WF case did not allow LWDA to go back into the system and edit the Other- Explain this issue could not be resolved at the local level. The LWDA keeps all documentation for all WIOA participants in a hard file due to issues such as these. The LWDA always wants to ensure any documentation that is connected to WIOA eligibility and workforce case lifecycle are available should the DMS not function properly.

Financial Monitoring Details

Finding(s):

No Findings.

Observation(s):

Observation A:

On drawdowns dated 10/14/2020 and 3/31/2021, some documents were missing MapQuest that is to be uploaded into the Work System.

Recommendation A:

According to 200 KAR 2:006, Section 7 (4)(3)(b), mileage for in-state travel shall be based on the Kentucky Official Highway Map, MapQuest Web site, Google Maps Web site, or similar web mapping service. Out-of-state mileage shall be based on the most recent edition of the Rand McNally Road Atlas, MapQuest Web site, Google Maps Web site, or similar web mapping

service. It is recommended to double check work prior to upload into Work Systems to ensure all required documents are present for this will assist in avoiding any future observations and/or findings.

END REPORT