



EDUCATION AND LABOR CABINET

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Sonja Bergman, Chair
EKCEP WDB
100 Airport Gardens Rd.
Hazard, KY 41701

Dear Ms. Miller and Ms. Bergman:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY21 Comprehensive Monitoring Report issued on March 30, 2023. 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,

Jim Beyea
Assistant Director

Attachment(s): PY21 Comprehensive Monitoring Review

WIOA Comprehensive Monitoring Review

EKCEP LWDB

January 30, 2023

Monitoring of the EKCEP Local Workforce Development Area

The EKCEP Local Workforce Development Area was monitored by the monitoring team staff on January 30, 2023. 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 February 9, 2023. 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 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 two (2) findings and no observations, and the financial monitor identified no findings and two (2) observations during the PY21 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. IEP/ISS Incomplete
2. Violation of Case Note Policy

Observation(s):

No observations

Financial Monitoring Summary

Finding(s):

No findings

Observation(s):

- A. Missing service in Kee Suite
- B. Missing MapQuest Service Information

PROGRAM MONITORING DETAILS

FINDINGS

Finding (1):

IEP/ISS Incomplete

Issue(s):

Youth: Workforce Case #003393196. One participant had an incomplete ISS and was missing short-term goals.

Citation(s):

According to Policy (29 U.S.C. § 3164(c)(1)(B)). The IEP/ISS shall contain the following components: short and long-term goals identified collaboratively to achieve the participant's specific occupational goal, objectives identified collaboratively as action steps to achieve each of the established goals, all goals and objectives shall address holistic case management including the elimination of barriers identified during assessment. All goals and objectives shall be measurable and attainable within the identified timeframe.

Instance(s):

1/15 (7%)

Required Action:

LWDB must ensure that all elements of the ISS/IEP are completed prior to providing training services. Training must be given to staff regarding the importance and process of including all information on the ISS/IEP. 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:

EKCEP's Virtual Career Advisor Academy demonstrates the importance of the IEP. It demonstrates how to complete the IEP during different scenarios with clients. Once the career advisor has completed the IEP section, they are quizzed on the knowledge they gained. IEP syllabus is attached to this monitoring response. Stephanie Kitchen, career advisor of #003393196, completed the training regarding IEP over and resubmitted her assignments to show she understands the importance of completing the IEP. I have attached her completion of this section of the Academy.

DWD Response:

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

Finding (2):

Violation of Case Note Policy

Issue(s):

1. Dislocated Worker: Workforce Case #003441188, #003144089, #003438537, and #003127658. Four participants had multiple case notes that were not entered within 10 business days.
2. Adult: Workforce Case #003440196, #003441422, and #003441293. Three participants had multiple case notes that were not entered within 10 business days.

Citation(s):

EKCEP Client Services Handbook for Adult, Dislocated Worker, and Out-of-School Youth
Section Four: Record Keeping and Reporting

- A. Case Notes 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.
 - A significant event related to the client’s life or progress within the program has occurred.
- B. In reference to Case Note Policy 16-027, “Case notes will be written at the time of the event or contact and entered into EKOS (State System) as soon as possible, not to exceed 10 business days.”

Instance(s):

7/15 (47%)

Required Action:

LWDB must adhere to EKCEP’s local Case Note policy. Data must be written at the time of the event or contact and entered into KEE Suite within 10 days. Training must be given to staff regarding the importance and process of entering data into KEE Suite within 10 days of its occurrence. 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:

EKCEP’s Virtual Career Advisor Academy demonstrates to career advisors the importance of entering case notes in a timely manner relating to the policies. Attached is a syllabus of the training that the career advisors receive on case notes. Alesia Brewer, Elva McCoy, Susan Patton and Mona Sammons were career advisors who had citations involving case note violations. All of the career advisors have completed the training on case notes. Attached are documents showing completion of those sections of the Academy.

DWD Response:

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

FINANCIAL MONITORING DETAILS

OBSERVATIONS

Observation A:

A service program was observed in KEE Suite for Workforce Case #003462496. This was then deleted. A new service program was not entered.

Recommendation A:

Any participant using WIOA funding must have a service entered in Kee Suite. It is recommended to always re-check all data is entered accurately to ensure the appropriate use of WIOA funds in the State system.

Observation B:

Missing Mapquest was found in Work Systems when reviewing two separate drawdowns.

Recommendation B:

It is highly recommended to ensure all required documentation is uploaded into the State System to avoid the possibility of any drawdown requests being denied in reference to the LWDB Drawdown Guidance.

END OF REPORT