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## EDUCATION AND LABOR CABINET

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September 27, 2023

Trish Niles, Chair  
Midpark Inc., HR Manager  
P.O. Box 326  
Leitchfield, KY 42755

Beth Roberts, Workforce Director  
Lincoln Trail Area Development District  
750 S. Provident Way  
Elizabethtown, KY 42701

Dear Ms. Niles and Ms. Roberts:

Thank you for your responses to the Workforce Innovation and Opportunity Act Title 1B PY21 Comprehensive Monitoring Report issued on August 17, 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 via email at [jim.beyea@ky.gov](mailto:jim.beyea@ky.gov) or [oetmonitoringteam@ky.gov](mailto:oetmonitoringteam@ky.gov).

Sincerely,

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

Jim Beyea  
Assistant Director

Attachment: Lincoln Trail PY21 Comprehensive WIOA Monitoring Final Report

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# **WIOA Comprehensive Monitoring Review**

## **LINCOLN TRAIL LWDB**

**July 17, 2023**

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## **Monitoring of the LINCOLN TRAIL Local Workforce Development Area**

The LINCOLN TRAIL Local Workforce Development Area was monitored by the monitoring team staff on July 17, 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 programs as well as Wagner-Peyser program relating to Program Year 2021. Also, a comprehensive financial review was conducted in respect to the WIOA program.

A closing conference was held on August 3, 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 LINCOLN TRAIL'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 LINCOLN TRAIL'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 one (1) finding and no observations, and the financial monitor identified no findings and no 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. Violation of Follow-Up Policy

**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):**

1. Adult: Workforce Case #003433478 and Workforce Case #003018979. One participant (WFC #003433478) was sent follow-up emails on 3/8/2022 and 5/11/2022 seeking employment outcome with no response. No additional follow-up was provided, and no discontinuance of follow-up services was documented in case notes. One participant (WFC #003018979) was sent an email on 9/17/2021 offering follow-up services, participant did not respond or decline follow-up, however, no further contact was made or attempted.
2. Youth: Workforce Case #003444656. One participant was never offered follow-up services and all communication with participant ceased once participant exited on 5/3/2022.

##### **Citation(s):**

Policy Number: LTWDA-22-051: Lincoln Trail Work Development Board Adult/Dislocated Worker Follow-Up Policy

Effective Date: September 20, 2022

Applies To: All WIOA Title I Programs

Follow-up services will be offered to all WIOA Title I Adult and Dislocated Worker program participants for up to twelve months following the first day of unsubsidized employment.

Although follow-up services are made available, participants may choose to opt out. Discontinuation of services must be documented by direct services provider staff in the State's case management system of record. This shall include detailed case notes identifying the reason and the date the service ended.

Policy Number: LTWDA-19-048: Lincoln Trail Work Development Board Youth Follow-Up Policy

Effective Date: August 21, 2019

Applies to: WIOA Eligible Youth

The Purpose of follow-up services is to ensure the youth is successful in employment and/or postsecondary education and training after exiting from the program. Follow-up services must include more than an attempt to contact the individual or contact made only to secure documentation in order to report a performance outcome. All youth participants must be provided an opportunity to receive follow-up services for a minimum of 12 months after the completion of participation, unless the participant declines to receive follow-up services. Follow-up services begins automatically in the case management system of record following the last expected date of service in the WIOA Title-B Youth program (and other KCC partner programs in which the participant is co-enrolled when no future services are scheduled).

**Instance(s):** 3/12 (25%)

**Required Action:**

LWDB must comply with the LWDB’s Follow-Up Policy # LTWDA-22-051 and #LTWDA-19-048. LWDB must ensure that all staff have reviewed the Local Follow-Up Policies. 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:**

This finding occurred with our previous Direct Services Provider (DSP) and their staff. LTWDB staff discussed the finding with the current provider and implemented the following corrective actions: The policies were reviewed with DSP staff and signed acknowledgments by each staff member are enclosed; LTWDB staff meets weekly with DSP leadership staff and will continue to emphasize compliance with these policies and sample participant records will be reviewed during contract monitoring to ensure follow-up requirements are being met.

**DWD Response:**

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

## **OBSERVATIONS**

No observations.

## **BEST PRACTICES**

The Department of Workforce Development would like to acknowledge the Best Practices conducted by Lincoln Trail’s Workforce Development team. They are as follows:

### **PROGRAM**

- Assessments and IEP’s are documented well.
- MSG’s are documented completely and accurately.
- Long-term and short-term goals on the IEP are documented.

### **FISCAL**

- Documentation is easy to understand.

- Staff responded very quickly and are great to work with.

## **Wagner-Peyser Monitoring**

The Kentucky Career Center – Elizabethtown, was monitored by the Department of Workforce Development (DWD) staff Anita Doster, on August 10, 2023. DWD monitored Wagner-Peyser Act compliance in the Elizabethtown Kentucky Career Center and met with Jennifer Carman, Workforce Development Manager and Monica Collins, Regional Program Manager. A randomly selected customer was 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 Elizabethtown Career Center, located at 233 Ring Road, Elizabethtown, KY 42701 served approximately 200 customers per week. Per Monica Collins and Jennifer Carmen, they have seen a decrease in customers served over the past couple of weeks. The staff at the career center consists of 8 full-time and 1 part-time Career Development Office (CDO) employees, 2 Office of Unemployment (OUI) employees, 4 WIOA employees, 13 Office for Vocational Rehabilitation (OVR) and Office for the Blind (OFB) employees, 2 Job Corps employees, 2 Community Action employees, and 2 One Stop Operator employees. Adult Education is not on the premises.

The Career Center is a one-story building with one main entrance with visible Door signage. Standard operation hours are from 8:00 a.m. to 4:30 p.m. with the busiest times on Monday mornings and lunch time. Upon entering the main lobby area, the reception desk is immediately in front of you. The right side of the reception desk is for Community Action registration and the left side of the desk is registration for all other Career Center Services. There is a small sign on the center of the desk directing you to one side or the other. A larger sign hung from the ceiling or placed in front of the desk, would provide clear and immediate instructions to the customers. A Veteran Priority of Service sign is hung on the front of the reception desk and is clear and visible. Veterans are always given priority. Upon arrival, customers are asked to complete a short Registration form and a Veteran Information Form (if applicable). Once completed, the receptionist enters the information into a shared Excel document that is visible by all career counselors. The receptionist can also send a Teams chat message to counselors, if necessary. Customers can sit in a waiting area which has round tables, Job Ads, Virtual Job Fairs, Outreach information, and a television monitor that displays information of interest to the career center customers including phone numbers, career center services, resume tips, etc. There is a separate space with Veteran information only. The career counselor providing services will greet the customer in the lobby. Customer wait time is generally less than 10 minutes. The reception desk is manned by a full-time CDO staff person and part-time mature worker volunteers from SCEP. A security guard sits directly behind the receptionists.

The resource area, directly behind the security guard has 14 operational computers, including 2 wheelchair accessible workstations and 3 telephone stations. CDO staff are available to provide technical assistance to customers. There are 3 offices for Employer interviews which take place at least once per week, a small and large conference room plus one training room with 10 computers. The training room is utilized weekly on Tuesdays for RESEA training sessions which include the partners in the building, a representative from the Community College, and 323 Staffing Solutions. Metalsa, a local manufacturing employer, and other employers are set-up in the lobby for recruitment after the training session. The training room is also utilized for TABE testing, resume assistance, job search, and financial literacy. Job Corp also utilizes the room.

When the participants have completed their time on the computers in the resource area, the last screen is an anonymous survey which provides feedback to the career counselors.

One randomly selected customer was interviewed. The customer was visiting the Career Center for job search through Indeed. This was his second visit to the Career Center, and he stated the receptionist was great, the Career Counselor was very helpful, and he indicated his visit was "smooth and efficient". He had no recommendations to improve services at the Career Center.

There are no Wagner-Peyser issues to address currently.

**END OF REPORT**