



**Andy Beshear**  
GOVERNOR

## EDUCATION AND LABOR CABINET

**Jamie Link**  
SECRETARY

Mayo-Underwood Building  
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Frankfort, Kentucky 40601  
(502) 564-3070

June 1, 2023

Treva Shirley, Chair  
South Central WDB  
Fit for Life  
Occupational Health & Employee Wellness  
Coordinator

Jon Sowards Director  
South Central Workforce Development Board  
2355 Nashville Road  
Suite C101  
Bowling Green, KY 42101

Dear Ms. Shirley and Mr. Sowards:

Enclosed is the Department of Workforce Development (DWD) report of the monitoring review that was conducted on April 4, 2023, by the DWD monitoring team. The monitoring review covered the Workforce Innovation and Opportunity Act (WIOA) federally funded program of the South Central Local Workforce Development Board (LWDB) for PY21.

The monitoring review was conducted to determine if WIOA formula funds were utilized consistent with federal requirements and grant agreements, as well as to familiarize and collect effective grant management practices. A comprehensive financial review was also conducted in respect to the WIOA program.

In summary, the report contains no WIOA Program Findings or Observations and one (1) Financial Finding with no Observations. Program and/or financial findings require corrective action within 30 days of receiving this report.

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,

Jim Beyea  
Assistant Director

Attachment: South Central PY21 WIOA Initial Monitoring Report

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# **WIOA Comprehensive Monitoring Review**

## **South Central**

**April 4, 2023**

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## **Monitoring of the SOUTH CENTRAL Local Workforce Development Area**

The SOUTH CENTRAL Local Workforce Development Area was monitored by the monitoring team staff on April 4, 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 2021. Also, a comprehensive financial review was conducted of all referenced programs.

A closing conference was held on April 19, 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 SOUTH CENTRAL'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 SOUTH CENTRAL'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 no findings or observations, and the financial monitor identified one (1) finding 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):**

No Findings

**Observation(s):**

No Observations

### **Financial Monitoring Summary**

**Finding(s):**

1. Overpayment of mileage reimbursement.

**Observation(s):**

No Observations

## **PROGRAM MONITORING DETAILS**

### **FINDINGS**

**Finding(s):**

No Findings

**OBSERVATIONS**

**Observation(s):**

No Observations

**FINANCIAL MONITORING DETAILS**

**FINDINGS**

**Finding (1):**

Overpayment of mileage reimbursement.

**Issue(s):**

1. Workforce case #003445213 was reimbursed twice for mileage for the timeframe of March 28, 2022 through March 31, 2022 totaling to a questioned cost of \$87.61. This expense occurred utilizing grant #271DW22.
2. Workforce case #003095637 traveled eight days and was reimbursed for nine days totaling to a questioned cost of \$20.59 for the month of September 2021. This expense occurred utilizing grant #274YT22.

**Citation(s):**

Memorandum of Agreement Between Commonwealth of Kentucky Education and Workforce Development Cabinet Department of Workforce Investment And The Local Area Development Districts/Concentrated Employment Programs/Fiscal Agents/Local Grant Subrecipients; The Chief Local Elected Officials; and The Local Workforce Development Boards.

ADDITIONAL Department of Workforce Investment Terms and Conditions

The Second Party, Third Party and Fourth Party shall:

Section 2. TRAVEL AND PER DIEM EXPENSES Issue reimbursement of travel expenses only for authorized and allowable expenses, including accommodations, established in accordance with 200 KAR 2:006 Section 7 including but not limited to mileage rate, per diem rates, and subsistence for all travel. WIOA funds shall not be used to pay for non-employees' travel, accommodation, or meal expenses. Further, the Second Party, Third Party, and Fourth Party shall not use WIOA funds to pay for travel, accommodation, or meal expenses for a non-employee and later be reimbursed by that non-employee for those expenses.

Although this citation was met, overpayment was discovered leading to a disallowed cost which is defined by 2 CFR 200:31 stating, "Disallowed costs means those charges to a Federal award that the Federal awarding agency or pass-through entity determines to be

unallowable, in accordance with the applicable Federal statutes, regulations, or the terms and conditions of the Federal award.”

**Instance(s):**

2/15 (13%)

**Required Action:**

LWDB must ensure each employee follows the 200 KAR 2:006 Kentucky State Travel policy, per the referenced MOA Agreement. LWDB must ensure the reimbursement request is reviewed thoroughly to assist in the avoidance of any questioned and/or disallowed cost. Per the email received from the Quality Control Coordinator on April 10, 2023, “We are in agreement the instances noted above are a disallowed cost totaling to **\$108.20.**” This amount is required 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: Jim Beyea  
500 Mero Street, 4CW, Office #434  
Frankfort, KY 40601

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

**LWDB Response:**

**DWD Response:**

**BEST PRACTICES**

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

**PROGRAM**

- Completion of assessments and IEP
- Monthly case notes are entered timely with detailed notes

**FISCAL**

- Fiscal documentation uploaded into State system, Kee Suite

- Quick response to document requests during monitoring
- Great communication during monitoring

**END OF REPORT**