

***Workforce Investment Act Youth Program
Review
Program Year 2013***

Issued to:

Henry County Public Schools

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Prepared by:

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OVERVIEW

The Henry County and Martinsville City Area is a moderate geographic area that is comprised of rural communities in addition to suburban and city communities with limited employment opportunities. Many of the residents seek employment and training opportunities outside of a 30 mile radius from their communities in order to expand their opportunities for self sustainability and skill enhancements. The community receives workforce development services through the Comprehensive Virginia Workforce Center-Martinsville location. The Martinsville Center location collaborates with other state and non-profit agencies with representatives from each of the agencies available in one location for the convenience of the citizens within the various communities. The community also receives personalized Business Services for the area employers from representatives within the center in addition to the Martinsville/Henry County Chamber of Commerce and the West Piedmont Workforce Investment Board. The Martinsville/Henry County Virginia Workforce Center averages 1,940 visitors monthly.

The Henry County Public School system operates the Workforce Investment Act In-School Youth program that serves youth from the ages of 14 through 21 and is located within The Center for Community Learning in Martinsville, VA. and serves three High Schools in the area which are; Bassett High School, Magna Vista High School, and Martinsville City High School.

Purpose of the Review

On May 12, 2014 The Programming Team of the West Piedmont Workforce Investment Board (WPWIB) conducted the required annual compliance review of the Youth WIA program operated by Henry County Public Schools for Program Year 2013. The purpose of the review was to determine whether procedures are in place to ensure compliance with the Workforce Investment Act, and to identify areas in which technical assistance is needed to ensure continuous improvement.

As part of the review, the team covered three major areas: eligibility, provided services, and outcomes. Good practices are included to highlight activities the review team commends the local area for providing.

The following pages include detailed information on the findings in the three major areas from the annual compliance review. For each area, the report may include findings, concerns, and considerations. If the review team identified a finding or concern, then a detailed description and required action/recommendation is provided. For the purpose of this report the following describes the difference between findings that require action and concerns with recommendations.

- Finding: Findings indicate that the area is out of compliance with current federal laws/regulations or state and local policies. To ensure compliance, each finding has a required action. Local areas must provide a corrective action plan for all findings.
- Concern: Concerns identify a potential risk to the local area and may result in a future finding if the issue is not addressed. Although this does not indicate that the local area is out of compliance, recommendations are provided to improve services to the local area.
- Consideration: Considerations indicate an area identified that would be a benefit to the local area.

Summary of Review

In-School Youth

General Eligibility	Income Eligibility	Youth Barrier	Ten Elements	Case Management	Assessments	ISS
100%	81%	100%	89%	73%	92%	53%

Pass Rate by Review Category

VaWc	Supportive Services	Occupational Skills Training	Work Experience Internship OJT	Closure Exit		
78%						

Pass Rate by Review Category

1. Good Practices

- 1.1 WPWIB commends the Henry County Public School (HCPS) system for maintaining a consistent presence within all three area High Schools to allow for increased assess for participants and school officials. The staff of In-School Youth has also provided many Leadership opportunities to familiarize their students with local and state history, government, and art opportunities that is available within the community.

2. Programmatic

2.1 Explanation of Area of Review

VCCS recommends that local area monitors attempt to review twelve files from each funding stream in order to recognize any patterns and possible issues. Ten in-school youth participant files were reviewed to ensure compliance with provisions of the WIA and other applicable laws and regulations.

Case Managers were given the flexibility to select the participant files that were reviewed for each program.

2.2 Findings

2.2.1 Eligibility

Two participant files reviewed were found with insufficient documentation to verify required income and/or general eligibility items.

- 2 revealed income/family size were incorrectly calculated and documented due to missing or incomplete information.

(See Attachment B: Explanation of Findings and Concerns for specifics on these findings.)

WIA and 20 CFR Part 652 establish general and specific eligibility criteria for participants. Local workforce investment areas are required to verify and document the eligibility of all participants served with WIA funds. In instances where inconsistency in documentation is eligibility related, the local workforce investment area is subject to the increased potential of questioned and/or disallowed costs. It is imperative for case managers to adhere to LWIA policy or guidance on eligibility and adequately document all determinations with LWIA accepted documentation. Acceptable documentation relating to income eligibility can be found on the VCCS Workforce Services website under "Virginia WIA Eligibility Guidelines" (http://www.vccs.edu/Portals/0/ContentAreas/Workforce/VWN/Eligibility_verify%20documentation.pdf).

Required Action:

The HCPS must obtain the necessary documentation to support the identified eligibility requirements. Eligibility documentation must be submitted to the WPWIB by Friday **June 27, 2014**.

If the documentation cannot be obtained and the participant is found to be in-eligible, the local area must notify the VCCS and take the necessary steps to reimburse the WIA program for any funds incurred on the participant.

2.2.2 Missing and/or Incomplete Documentation

Examples of missing and/or incomplete documentation noted during the participant file review were:

- Missing documentation to support 10 elements- leadership development, alternative school enrollment, and occupational skills training.

(See Attachment B: Explanation of Findings and Concerns for specifics on this finding.)

Required Action:

Ensuring that the participant files contain the necessary documents is essential towards maximum case management and positive performance outcomes. Case managers and management must take care to ensure that all program documentation is completed and signed as required prior to eligibility determination and any dispensation of services.

2.2.3 VaWC Discrepancies

Six participant files revealed VaWC discrepancies and failure to appropriately align the VaWC client record with program delivery. Examples of this are as follows:

- Activities extending beyond the limitations noted in VWL 11-02. Service codes need to reflect VWL limitations. If services are still being provided beyond activity time limit, the activity dates may be extended but the extensions to projected end dates need to be documented through VOS case notes.
- Missing service activity codes in VaWC (ex., Supportive Service, Work Experience, Assessments). VOS activities must align with program services provided.
- Placement of participants into VaWC activities that are not supported by documentation in the file.
- System closed activities due to lack of case manager activity in VaWC and timely management of the file.

(See Attachment B: Explanation of Findings and Concerns, for specifics on these findings.)

As stated in **VWL 10-02**, "it is important that service providers are held accountable for aligning program delivery with program results, i.e. common measures. Data entry and tracking in VaWC related to participant's services and reports must be timely, relevant, accurate and consistent. Entering participant data in VaWC is critical to ensure that performance is reported accurately."

Required Action:

HCPS must review the application of VWL #11-02, WIA Service Code Definitions and Limitations with service provider management and case managers to ensure that service codes are appropriately entered into the system and accurately reflect participant activities and services received. HCPS must review these participant cases and make or delegate to WPWIB the appropriate corrections to be updated in VaWC by Friday **June 27, 2014**.

2.2.4 Assessments

Six participant files reviewed demonstrated an inconsistency in the administration of assessments and the supporting documentation in both the file and the VaWC system.

- Dates on Activity Services do not match the file record that is placed in the participants file.
- Missing copies of assessments in participants file.

(See Attachment B: Explanation of Findings and Concerns, for specifics on these findings)

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HCPS must review these participant cases and make or delegate to WPWIB the appropriate corrections to be updated in VaWC by Friday, **June 27, 2014**.

3.3 Concerns

3.3.1 ISS Goals

Nine participant files reviewed demonstrated Individual Service Strategy goals and objectives that did not always align with the participant's needs or the services they actually received. In some cases, the goal descriptions entered into VaWC ISS read more like an objective assessment of the client's situation and not a description of the client's goals and steps for achieving those goals.

(See Attachment B: Explanation of Findings and Concerns for specifics on these findings.)

The ISS should serve to document participants' needs and goals, as well as the services provided to help them to attain their goals and allow an individual to be more employable. For those participants who have been

identified as basic skills deficient, the Individual Service Strategies should include a goal and outline specific activities to help them improve those skills.

Recommendation:

Case managers should clearly identify goals with objectives and related activities in the IEP/ISS and align them with activities and services to improve outcomes for the individual.

3.3.2 Case Notes

Eight of the youth files reviewed were found to have concerns with case notes.

- Participant contact and notes were not always monthly, per local policy.
- Notes did not provide sufficient information to follow participant activities and progress.
- Case notes showed a delay in entry of notes into VaWC with more than 14 days between the Contact date and Create date.

(See Attachment B: Explanation of Findings and Concerns for specifics on these findings.)

Recommendation:

Keeping well documented case notes is an essential part of case management. This demonstrates that participants are receiving adequate contact and assistance in successfully achieving their goals. In addition, it provides a written record of services and work with an individual should the case manager change or if the individual returns to the program at another time.

3. Next Steps

None at this time due to a change in providers.

Attachment A: Sample Corrective Action Plan

The corrective action plan must be submitted within 30 days of receipt of the findings report provided by VCCS. The plan must be signed and dated by the local area Executive Director.

Required Actions	Corrective Action	Expected Completion Date
Programmatic		
2.2.1 Eligibility		
2.2.2 Missing and/or Incomplete Documentation		
2.2.3 VaWC Discrepancies		
2.2.4 Assessments		

Concerns	Corrective Action	Expected Completion Date
Programmatic		
3.3.1 ISS goals		
3.3.2 Case Notes		

Name of Contracted Provider Representative (print): _____

Signature of Contracted Provider Representative: _____

Date: _____

Attachment B:

Henry County ISY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1572286	Angel Brown	<p><i>More than a 30 day lapse in case notes for 11/2012, 12/2012, 6/2013,7/2013,8/2013,3/2014.</i></p> <p><i>Case notes entered outside Timely data entry rule (14 days) contact date 2/12/2013 create date 3/22/2013, contact date 12/19/2013 create date 1/6/2014</i></p> <p><i>Signature date of assessment does not match service date in VaWC. There are 2 ISS developed in system both have been closed by the system. Dates of ISS 413 do not match the participants date of enrollment</i></p>	
1795676	Valery Smith	<p><i>Participant has IEP but income verification is still required before making participant a family of one. Last 4 months of income are in file but 2 prior months are not.</i></p> <p><i>Documentation to verify probation barrier is not in file.</i></p> <p><i>No Documentation in file to support any of the 10 elements</i></p> <p><i>ISS has not been developed</i></p>	
1591922	Cody Akers	<p><i>Assessments are not referenced in the Goal.</i></p> <p><i>ISS has not been signed within a reasonable time frame (30 days)</i></p>	
1778518	Aletia P. McDaniel	<p><i>30 days lapse in case note for month of March 2014</i></p>	
1725075	Jacob Martin	<p><i>Case note titled "Leadership Development opp." is dated 04/04/2014 and case note titled "Career Scope Results" dated 02/25/2014 is more than 30 days apart.</i></p> <p><i>Activity Code #413 Develop ISS extended for 90 days, limit is 30 days. Activity Code #412 Objective Assessment extended for 90 days, limit is 30 days.</i></p> <p><i>ISS not reviewed every 90 days with client.</i></p> <p><i>Activity Code #413 Develop ISS extended for 90 days, limit is 30 days. Activity Code #412 Objective Assessment extended for 90 days, limit is 30 days.</i></p>	

Henry County ISY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1768159	Alexis Hairston	<p>Case note titled "Careerscope" is dated 03/12/2014 and case note titled "Enrollment" dated 12/27/2013 is more than 30 days apart. Case note titled "Enrollment" has a contact date of 12/27/2013 and a creation date 01/17/2014, Case note entered outside Timely data entry rule (14 days).</p> <p>ISS is dated 05/07/2014 and Activity Code is dated 03/26/2014.</p> <p>ISS only list goals, need to list objectives relating to achieving goals.</p> <p>Activity Code #413 Develop ISS extended for more than 30 days, limit is 30 days.</p>	
1805221	Tiffani Gregory	<p>Most Current state eligibility checklist is not in file.</p>	
1799696	Daja Givens	<p>Most Current state eligibility checklist is not in file.</p> <p>Client signature missing date on EEO Grievance Form.</p> <p>Case note titled "Code 429 closed" dated 04/03/2014 and previous case note titled "Code 410" dated 02/20/2014, more than 30 days. Case note titled "Unable to see" dated 02/06/2014 and previous case note titled "Holiday Treat Bag" dated 12/17/2013, more than 30 days.</p> <p>ISS only list goals, need to list objectives relating to achieving goals.</p>	
1721481	Dottie Davis	<p>Case note titled "Code 410" was conducted on 02/20/2014 and created on 04/03/2014. Case note titled "Holiday Treat Bag" was conducted on 12/17/2013 and created on 01/06/2014. Case note titled "Work Readiness Application was conducted on 09/19/13 and created on 10/04/2013.</p> <p>Dates on Objective Assessment Activity Service do not match dates on actual test in client file.</p> <p>Missing ISS in client file.</p> <p>ISS only list goals, need to list objectives relating to achieving goals.</p>	

<p>1793882</p>	<p><i>Keon Broadnax</i></p>	<p><i>CM did not complete Low Income Verification Form to show documentation of calculation of income items presented.</i></p> <p><i>Only one Activity code in system; Objective Assessment.</i></p> <p><i>Assessment missing in file or has not been completed.</i></p> <p><i>Missing ISS in file.</i> <i>No ISS created in VOS system.</i></p> <p><i>Missing Activity Codes for Leadership Development services. Activity Code #412 Objective Assessment extended for more than 30 days, limit is 30 days.</i></p>	
<p>1725075</p>	<p><i>Jacob Martin</i></p>	<p><i>Case note titled "Leadership Development opp." is dated 04/04/2014 and case note titled "Career Scope Results" dated 02/25/2014 is more than 30 days apart.</i></p> <p><i>Activity Code #413 Develop ISS extended for 90 days, limit is 30 days. Activity Code #412 Objective Assessment extended for 90 days, limit is 30 days.</i></p> <p><i>ISS not reviewed every 90 days with client.</i></p>	

NO RESPONSE FROM PY13 PROVIDER

PROVIDER CHANGE FOR PY14

