

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

Issued to:

**Pittsylvania County Community Action
Martinsville/Henry County Out-of-school Youth
June 24, 2014**

Prepared by:

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West Piedmont Workforce Investment Board**

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 Pittsylvania County Community Action operates the Workforce Investment Act Out-of-School Youth program that serves youth from the ages of 14 through 21 and is located at the Virginia Workforce Center in Martinsville, VA.

Purpose of the Review

On May 16 through May 18, 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 Pittsylvania County Community Action 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

Out-of-School Youth

General Eligibility	Income Eligibility	Youth Barrier	Ten Elements	Case Management	Assessments	ISS
85%	75%	92%	33%	64%	88%	69%

Pass Rate by Review Category

VaWc	Supportive Services	Occupational Skills Training	Work Experience Internship OJT	Closure Exit		
51%	33%	68%	85%	91%		

Pass Rate by Review Category

1. Good Practices

- 1.1 WPWIB commends the Pittsylvania County Community Action OOOY for working diligently to address and resolve the issues that the entire WPWIB17 region was facing after 3 years of continuous failure of the Literacy/Numeracy common measure.

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. Twelve out-of-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

Six participant files reviewed were found with insufficient documentation to verify required income, general eligibility items and/or youth barriers.

- 2 revealed insufficient documentation to verify birth date and citizenship.
- 3 revealed income/family size were incorrectly calculated and documented due to missing or incomplete information.
- 1 revealed insufficient documentation to verify youth barrier.

(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 PCCA 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

Eight 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:

PCCA 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. PCCA 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

Seven 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)

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.

PCCA 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

Twelve 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

Eleven 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

Complete as directed information listed in Findings and Concerns in the previously written documentation.

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	Current AD/DW staff will continue to attempt to correct any eligibility issues. Youth Program transferred to another agency.	We have placed calls to Social Services and faxed the names and numbers to see if they will release the information. Upon receipt of information, we will place In files.
2.2.2 Missing and/or Incomplete Documentation	Current AD/DW staff will continue to attempt to obtain documents.	Upon receipt of requested information.
2.2.3 VaWC Discrepancies	Current AD/DW staff will continue to attempt to correct discrepancies.	“ “
2.2.4 Assessments	Current AD/DW staff will continue to improve job performance.	“ “

Concerns	Corrective Action	Expected Completion Date
Programmatic		
3.3.1 ISS goals	Program transferred to another agency.	
3.3.2 Case Notes	Program transferred to another agency..	

Name of Contracted Provider Representative (print):

Everlena Ross

Signature of Contracted Provider Representative:

Everlena Ross

Date:

6-27-14

ATTACHMENT B:

Martinsville Henry County OSY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1666701	<p>Kendra Cabiness</p> <ul style="list-style-type: none"> <i>We had implement a PIP plan for future improvemet</i> <p><i>Martinsville youth program was stopped on 12/31/2013</i></p>	<p>No documentation of Leadership development.</p> <p>Activity Service Code; #412 Objective Assessment extended past 30 days.</p> <p>There are 3 Objective Assessment Activities entered into VOS, only 1 date matches the Career scope, none of the other dates match anything in file.</p> <p>ISS does not reference assessments</p> <p>Occupational Skills Training Activity code #410 Leadership Development and activity code #412 Objective Assessment are extended past 30 days.</p>	
1232833	<p>De'Erica Hairston</p> <p><i>Martinsville youth program was stopped on 12/31/2013</i></p>	<p>Verification of receiving Social Services cannot be verified with a self-attestation.</p> <p>Case note titled "Audit Findings" is dated 03/22/2013 and prior case note titled "2nd Quarter Follow-up" is dated 12/17/2012, next one is titled "1st Quarter Follow-up" dated 10/05/2012, and next one is titled "WIA Deleted Case Closure" dated 07/17/2012, and final one is titled "Closed Case" and dated 04/17/2012. Activity code #410 Leadership Development extended past 30 days.</p> <p>There are 2 Objective Assessment Activities entered into VOS, none of the dates match anything in file.</p>	

	<p><i>Moving forward all activity codes will be entered in VWC We had implemented a PIP for future improvement.</i></p>	<p><i>Assessments are not referenced in the ISS</i></p> <p><i>Activity code #410 Leadership Development is extended past 30 days. Client received Child Care Assistance.</i></p> <p><i>Client received childcare assistance and a Needs Analysis Form was not completed for client. There also is not an Activity code in VOS assigned to this service.</i></p> <p><i>Employment was not gained from the OJT</i></p>	
<p>1080682</p>	<p><i>Shamika Dillard Youth brought in copy of birth certificate</i></p> <p><i>We had implemented a PIP for future improvement.</i></p>	<p><i>Birth Certificate verification form is not valid.</i></p> <p><i>No activity codes assigned for Leadership Development.</i></p> <p><i>ISS needs to include all goals connected to Activity Services to include Leadership Development and an Employment goal.</i></p> <p><i>CRC and Leadership Development Activity Services are missing.</i></p> <p><i>Work Experience Performance Evaluations were not performed or placed in the file.</i></p>	
<p>1618460</p>	<p><i>Terrell Martin</i></p> <p><i>Case note is in file.</i></p> <p><i>Martinsville youth program was stopped on 12/31/2013</i></p> <p><i>This was on error</i></p>	<p><i>Not enough description and supporting documentation on Leadership Development activities.</i></p> <p><i>Case note titled "Attempted to Contact" dated 2/5/2014 and prior case note titled "Attended Workshop" dated 12/18/2013; more than 30 days apart.</i></p> <p><i>No objectives were assigned to any of the goals in the ISS. It is necessary to show what will be the steps taken to achieve the goals.</i></p> <p><i>Missing documentation in file to support transportation assistance. Client was actually provided a transport service to take him to and from his home to a Leadership Workshop at the center. The student did not receive any Monetary amount for the transportation assistance</i></p>	

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1716038	<p>CeCe Hamlett</p> <p><i>Case note and sign in sheets document leadership workshops</i></p>	<p><i>Low Income verification was received approximately a month after enrollment date.</i></p> <p><i>No documentation of Leadership development.</i></p> <p><i>Case note titled "Attempted to Contact" dated 2/28/2014 and prior case note titled "Updated code 414" dated 12/30/2013; more than 30 days apart.</i></p> <p><i>ISS needs to include all goals connected to Activity Services to include Leadership Development and an Employment goal.</i></p>	
1642351	<p>Sonora Logan</p> <p><i>Martinsville youth program was stopped on 12/31/2013 that why there is a gap between the case notes</i></p>	<p><i>No documentation of Leadership development, tutoring, and Adult Education training.</i></p> <p><i>Case note titled "Attempted to Contact" dated 2/5/2014 and prior case note titled "Reminder Text" dated 12/18/2013; more than 30 days apart. Case note titled "Come to the office" entered outside the timely data entry rule (14 days) contact date of 7/31/2013 creation date of 8/2/20013.</i></p> <p><i>Activity Service code dates do not match the dates on the actual tests in file.</i></p> <p><i>No objectives were assigned to any of the goals in the ISS. It is necessary to show what will be the steps taken to achieve the goals.</i></p> <p><i>ISS needs to include all goals connected to Activity Services to include Leadership Development and an Employment goal.</i></p>	

Martinsville Henry County OSY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1187788	<p>Chelsea R. Baker</p> <p><i>Case note documents</i></p>	<p><i>VaWC verification for Snap Benefits as Self Certification. Form in file for verification of Snap Benefits does not list the participant to be on the case.</i></p> <p><i>Documentation needed for verification of activities provided</i></p>	

	<p><i>leadership development</i></p> <p><i>The Martinsville youth program was stopped 12/31/2013</i></p> <p><i>LMI Information was placed in file for occupational Skills Training</i></p>	<p><i>for Leadership Development and Occupational Skills.</i></p> <p><i>Case note entered outside of timely data entry rule (14 days) contact date 6/20/13 create date 7/10/13.</i></p> <p><i>30 day lapse case note. No note for the month of January 2014.</i></p> <p><i>Activity 434 extended without a case note description per VWL 11-02. Participant is still active in this activity that is not an inactive activity per VWL 11-02.</i></p> <p><i>Participant remains BSD but there is not tutoring activity nor case notes documenting tutoring is being provided.</i></p> <p><i>ISS references TABE scores were raised but assessment upon enrollment are not listed.</i></p> <p><i>Activity for Supportive Service provided for Transportation withno documentation in file to support this service. Case notes also reflect supportive service provided</i></p> <p><i>LMI is missing in file for Occupational Skills Training.</i></p> <p><i>At enrollment into Occupational Skills Training Participant remained BSD and below the required 8th grade level to be enrolled into skills training.</i></p> <p><i>Training is not referenced in the ISS</i></p>	
<p>1458839</p>	<p><i>Amanda I. Wolfe</i> <i>Corrected telephone verification</i></p> <p><i>The Martinsville youth program was stopped 12/31/2013</i></p> <p><i>We had implemented a PIP for future improvement.</i></p>	<p><i>Telephone verification document lacks information for verification of citizenship. Participant’s birthday is missing on form.</i></p> <p><i>No Documents to support Leadership Development activities.</i></p> <p><i>30 day lapse in case notes. No notes for: 3/2012, 6/2012, 7/2012, 8/2012, 9/2012, 11/2012, 12/2012, 3/2013, 5/2013</i></p> <p><i>ISS list participant as participating in Occupational Skills Training for C N A however no documentation to verify that participant took part in this training. Occupational Skills Training was part of her initial ISS.</i></p> <p><i>Assessments are not listed in the ISS.</i></p>	

		<p><i>Missing activity codes for Transportation service and incentives provided to participant.</i></p> <p><i>Dates of actual service do not agree with VaWC activity codes entered.</i></p>	
1376494	<p>Terrence D. Woody Corrected telephone verification</p> <p>The Martinsville youth program was stopped 12/31/2013</p> <p>We had implemented a PIP for future improvement.</p>	<p><i>Telephone verification document lacks information for verification of citizenship. Participant's place of birth is missing.</i></p> <p><i>Verification for SNAP Benefits is missing date that service began, number of person(s) on case and if the participant is part of the case.</i></p> <p><i>30 day lapse in case notes. No case notes for: 3/2012, 4/2012, 5/2012, 6/2012, 8/2012, 10/2012, 11/2012, 1/2013, 2/2013, 3/2013</i></p> <p><i>No Post TABE Test was administered.</i></p> <p><i>ISS does not reference BSD.</i></p> <p><i>No activity code for Work experience activity.</i></p> <p><i>Dates in the VaWC for TABE Test do not coincide with documents in file.</i></p> <p><i>No documents to support Leadership Development Activity.</i></p> <p><i>ISS does not list Competencies mastered from the Work Experience Activity</i></p>	
1614311	<p>Kayla Dalton</p> <p>We had implemented a PIP for future improvement.</p> <p>Case note documents services provided to client</p> <p>LMI Data placed in file</p>	<p><i>No Documentation to support Leadership Development Activity</i></p> <p><i>30 day lapse in case note. No note for 1/2014</i></p> <p><i>Lack of detail description in ISS. Iss does not list assessments nor activities provided to Participant</i></p> <p><i>Occupational Skills Activity was not closed in a timely manner.</i></p> <p><i>Missing Activity codes for services provided.</i></p> <p><i>LMI Data has not been provided as part of the Occupational Skills Training documents.</i></p> <p><i>Activity for Occupational Skills still active and should be closed</i></p>	

	<p>Youth was placed in case closure</p>	<p><i>due to completion of training.</i></p> <p><i>ISS lack detailed description. Competencies or skills mastered as part of the work experience have not been listed.</i></p> <p><i>No performance evaluation conducted as part of the work experience.</i></p> <p><i>No services are being provided to participant. Participant has obtained employment according to case notes. Case should be closed.</i></p>	
1129713	<p><i>Tracey R. Cheatham</i> <i>First case note states that youth came into the program pregnant</i></p> <p><i>We had implemented a PIP for future improvement.</i></p> <p><i>Martinsville youth program was stopped on 12/31/2013</i></p> <p><i>Documentation in file to support from ARK of The Lamb Inc. transportation company</i></p> <p><i>LMI is in the file</i></p> <p><i>Didn't start work experience until 09/17</i></p>	<p><i>Pregnant/Parenting listed as barrier. Improper documentation used to support this. Birth of child was after enrollment of participant. CM used birth certificate of child as proof of barrier</i></p> <p><i>No documentation to support activity Leadership Development</i></p> <p><i>30 day lapse in case note. Not case notes for: 12/2012, 2/2013, 3/2013, 1/2014</i></p> <p><i>No Post TABE test was administered before anniversary date of participant.</i></p> <p><i>ISS lack detailed description. Assessment are not listed. CM placed case notes as part of the ISS.</i></p> <p><i>Missing activity codes for incentives, Transportation Supportive Service, background check and drug test.</i></p> <p><i>No documentation to support Transportation Supportive Service provided to the Participant.</i></p> <p><i>No LMI Data to support Occupational Skills Training.</i></p> <p><i>Work Experience is documented improperly in the VaWC</i></p> <p><i>Work Experience Receipt form is missing from Timesheet period 9/17 through 9/13.</i></p>	
1526590	<p><i>LaVonna D. Giles</i></p> <p><i>All information is on verification including the state</i></p>	<p><i>Telephone verification document lacks information for verification of citizenship. Participant's place of birth is missing.</i></p> <p><i>No documentation in file to support Leadership Development</i></p>	

	<p><i>Martinsville youth program was stopped on 12/31/2013</i></p> <p><i>We had implemented a PIP for future improvement.</i></p>	<p><i>and Incentive provided to participant.</i></p> <p><i>Case notes entered outside of timely data entry rule (14 days) contact date 10/15/2012 create date 10/30/12, contact date 8/2/2013 create date 8/20/2013.</i></p> <p><i>30 day lapse in case notes. No case notes for: 12/2012, 5/2013, 6/2013, 1/2014, 2/2014</i></p> <p><i>Activity codes 434, 425 extended without a case note description per VWL 11-02.</i></p> <p><i>ISS lacks detailed description. Does not list competencies mastered from work experience provided to participant.</i></p> <p><i>No Work Experience Evaluation in file.</i></p> <p><i>Leadership Development provided with no documentation to support service.</i></p> <p><i>Missing activity code for Incentives provided to the participant.</i></p> <p><i>No documentation in file for Supportive service provided.</i></p>	
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