

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

Issued to:

Patrick County Public Schools

June 17, 2014

Prepared by:

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OVERVIEW

Patrick County is a large geographic area that is comprised of rural communities with limited employment opportunities and very personalized services due to the close knit communities and smaller populations. Many of the residents seek employment and training opportunities outside of a 30 mile radius from their community in order to expand their opportunities for self sustainability and skill enhancements. The community receives workforce development services through the Virginia Workforce Center-Stuart satellite office that is operated by the Patrick County Public School system. The Stuart satellite office contain the representatives for the Workforce Investment Act Adult and Dislocated Worker program services, in addition to the Out of School Youth Program which serves Youth from the ages of 14 to 21. Also, the Adult Education program operates and is located within the satellite office. The community also receives personalized Business Services for area employers from representatives within the satellite office from the Workforce Investment Act program. The Virginia Workforce Center-Stuart satellite location averages between 200 and 250 visitors monthly.

The Patrick County Public School system also operates the Workforce Investment Act In-School Youth program that serves youth from the ages of 14 through 21 and is located within Patrick County High School.

Purpose of the Review

On May 7 through May 9, 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 Patrick 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%	100%	100%	90%	69%	83%	72%

Pass Rate by Review Category

VaWc	Supportive Services	Occupational Skills Training	Work Experience Internship OJT	Closure Exit		
67%	57%		92%	100%		

Pass Rate by Review Category

Out-of-School Youth

General Eligibility	Income Eligibility	Youth Barrier	Ten Elements	Case Management	Assessments	ISS
100%	67%	100%	100%	75%	94%	90%

Pass Rate by Review Category

VaWc	Supportive Services	Occupational Skills Training	Work Experience Internship OJT	Closure Exit		
85%	71%		88%	100%		

Pass Rate by Review Category

1. Good Practices

- 1.1 WPWIB commends the Patrick County Public School system 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. Ten in-school youth participant files and nine out-of-school youth 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

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

- 3 revealed income/family size were incorrectly calculated and documented due to missing or incomplete information from the Dept. of Social Services Verification.

(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 PCPS 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

Nineteen 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:

PCPS 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. PCPS 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

Fourteen 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		

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: _____

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1662763	Susie Vipperman	<p><i>Case Notes entered outside of timely data entry rule (14 days) contact date 6/4/2013 create date 5/16/2013, contact date 7/8/2013 create date 6/12/2013. 30 day lapse for the month of July 2013</i></p> <p><i>Participant is under the age of 18. Parent's signature is missing for the ISS. ISS lacks detailed description.</i></p> <p><i>Tutoring was provided on 5/2/2013 reference case note dated 11/21/2013 however this activity is not reflected in the VaWC. Activity Code 429 has not been closed per VWL 11-02 , Youth is receiving 434 activity. Case note describes this activity for study and time management skills. Tutoring activity is not in place and is needed due to barrier In need of additional assistance - due to losing a potential graduation credit and attendance issues have passed those allowable under the compulsory attendance rules.</i></p> <p><i>ISS does not include the list of competencies to be mastered on the summer internship</i></p>	
1675245	Bo Vipperman	<p><i>Case Note entered outside of timely data entry rule (14 days) contact date 4/25/2014 create date 5/7/2014</i></p> <p><i>ISS Participant under the age of 18 requires parent/guardian signature. ISS lacks detailed description.</i></p> <p><i>Missing Supportive Service Activity code for service provided. Participant still active in 429 activity service that is now obsolete VWC 11-02</i></p> <p><i>ISS does not include the list of competencies to be mastered on the summer internship</i></p>	
1503721	Rebecca King	<p><i>30 days lapse Case Notes July 2012, October 2012-September 2013, November 2013, March 2014.</i></p> <p><i>ISS lacks detailed description</i></p>	

		<p><i>Documentation dates do not match activity dates in VaWC for activity 481 Supportive Service Mileage.</i></p> <p><i>ISS does not include the list of competencies to be mastered on the summer internship</i></p>	
1171919	Barry Hodges	<p><i>No Documentation in file to support at least one of the 10 elements.</i></p> <p><i>30 day lapse in Case Note for July 2011, Sept 2011, Feb 2012, June 2012, July 2012, June 2013</i></p> <p><i>ISS lacks description. Assessment information and one of the 10 elements is not documented.</i></p>	
1510638	Ryan Pennington	<p><i>Youth In Need of Additional Assistance is the barrier and the file has all the proper documentation to prove the barrier, however CM did not use proper form for documentation</i></p> <p><i>Some case notes were created on paper and entered at a later date into the system. All case notes should be entered into the VOS system within 14 days of contact date.</i></p> <p><i>VaWC shows participant still active in activity 429 which is now obsolete VWL 11-02</i> <i>Activity Service #410 can only be open for 90 days following state guidelines VWL 11-02</i></p>	
1661962	Tonya Holt	<p><i>Youth In Need of Additional Assistance is the barrier and the file has all the proper documentation to prove the barrier, however CM did not use proper form for documentation.</i></p> <p><i>Some case notes were created on paper and entered at a later date into the system. All case notes should be entered into the VOS system within 14 days of contact date.</i></p> <p><i>Activity Code #412 for Objective Assessment entered into file but there is no documentation in file to support service.</i></p>	

		<p><i>ISS lacks description</i></p> <p><i>VaWC shows participant still active in activity 429 which is now obsolete VWL 11-02</i></p> <p><i>Activity 410 and 411 can only be open for 90 days following state guidelines VWL 11-02</i></p> <p><i>Supportive Service Contract dates are for 06/06/2013 thru 06/27/2013 and VaWC Service Activity is for 06/04/2013 thru 06/27/2013.</i></p> <p><i>One timesheet does not have dates of time that was worked. Fiscal supporting documents need to have dates listed on checks for time period that was paid in order to match to timesheet.</i></p>	
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Patrick County ISY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1706189	Britini Vaughn	<p><i>Youth In Need of Additional Assistance is the barrier and the file has all the proper documentation to prove the barrier, however CM did not use proper form for documentation.</i></p> <p><i>ISS lacks descriptive information</i></p> <p><i>VaWC shows participant still active in activity 429 which is now obsolete VWL 11-02</i></p>	
1706202	Briana Vaughn	<p><i>Youth In Need of Additional Assistance is the barrier and the file has all the proper documentation to prove the barrier, however CM did not use proper form for documentation.</i></p> <p><i>Participant still active in inactive activities 434 and 429. Per VWL 11-02 activities should be closed.</i></p> <p><i>ISS lacks detailed description</i></p>	
1723752	Samantha McGuire	<p><i>Participant still active in inactive activities 429 and 434 per VWL 11-02</i></p> <p><i>ISS lacks detailed description</i></p>	
1652639	Talon Vaughn	<p><i>Youth In Need of Additional Assistance is the barrier and the</i></p>	

		<p><i>file has all the proper documentation to prove the barrier, however CM did not use proper form for documentation.</i></p> <p><i>Case note "Contact" is dated 04/01/2014 and the previous case note "3rd Quarter Follow Up" dated 02/05/2014, more than 30 days.</i></p> <p><i>Participant still active in inactive activity 429. Per VWL 11-02 activity should be closed.</i></p> <p><i>Activity Code #412 for Objective Assessment entered into file but there is no documentation in file to support service.</i></p> <p><i>ISS lacks detailed description</i></p> <p><i>Missing activity code for Supportive Services.</i></p> <p><i>Dates on timesheets does not match contract dates. Goal for Summer Employment does not list competencies .Fiscal supporting documents need to have dates listed on checks for time period that was paid in order to match to timesheet.</i></p>	
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Patrick County OSY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1585452	Shanille Leigh	<p><i>CM used Telephone Verification form and has all the necessary documentation with the exception of the actual dates of the currently active Food Stamp order.</i></p> <p><i>Case Note titled "Follow-Up Contact Attempt" is dated 03/27/2014 and the previous case note titled "New Address" is dated 01/10/2014; more than 30 days. Activity Service Code #434 Job Placement extended for 6 months and limitation is for 90 days, no case note.</i></p> <p><i>More descriptive information needs to be included in ISS.</i></p> <p><i>Activity Service Code #434 Job Placement extended for 6 months and limitation is for 90 days, no case note.</i></p>	
1629019	Kandra McBride	No Findings	

969963	Rachel Frazier	<p><i>Case Note titled "Follow-Up Contact Attempt" is dated 03/10/2014 and the previous case note titled "Emailed Rachael" is dated 01/31/2014; more than 30 days. Case note titled "Xmas Cheer" is dated 11/29/2013 and the previous case note titled "Employment" is dated 09/30/2013; more than 30 days.</i></p> <p><i>More descriptive information needs to be included in ISS.</i></p> <p><i>IEP does not list competencies, only mentions the actual Activity that is determined to be a goal.</i></p> <p><i>Fiscal supporting documents need to have dates listed on checks for time period that was paid in order to match to timesheet.</i></p>	
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Patrick County OSY

USER NAME	NAME	PERFORMANCE OUTCOME REVIEW	CORRECTED ?
1734395	Courtney E. Marshall	<p><i>Case note entered outside of timely data entry rule (14 days) contact date 12/05/2013 create date 11/08/2013</i></p>	
1641334	Austin M.Dyer	<p><i>Case Notes entered outside of timely data entry rule (14 days) contact date 3/27/2013 create date 4/26/2013, contact date 4/3/2013 create date 4/26/2013</i></p>	
1684459	Joshua L. Minnick	<p><i>No Findings</i></p>	
1358608	Ashley Roach	<p><i>Start date of SNAP Assistance is not listed on the telephone verification</i></p> <p><i>Case Notes entered outside of timely data entry rule (14 days) contact date 2/13/2012 create date 1/13/2012, contact date 8/28/2012-8/9/2012</i></p> <p><i>IEP does not list the competencies or skills to be mastered. Performance evaluations are not filled out.</i></p>	
1496793	Joseph D. Cassady	<p><i>Begin date of Snap Benefits is not listed on the telephone verification or verification form which was faxed into DSS. DSS provided case number and benefit amount provided but family size, names that are on the case and date service begin is not included.</i></p> <p><i>Case Notes entered outside of timely data entry rule (14 days)</i></p>	

		<p><i>contact date 9/6/2012 create date 8/17/2012</i></p> <p><i>Activity dates are all inconsistent with the documentation in file. The Case Note for Basic Skill Training activity 414 reflects date of 6/19/2012 but VaWC reflects the date of 6/11/2012. Worksheets have date on documentation. Careerscope documentation in file is dated 6/11/2012 VaWC activity is dated 6/4/2012.</i></p> <p><i>Activities, TABE Scores both post and pre and Work Competencies for the participants work experience are not documented in the ISS.</i></p>	
1586122	Courtney Adkins	<p><i>ISS Goals do not reference assessments</i></p> <p><i>Activity Code #485 Supportive Service does not have supportive documentation in file.</i></p> <p><i>Supportive Service Determination Documentation is missing in file.</i></p>	

NO RESPONSE FROM PY13 PROVIDER

PROVIDER CHANGE FOR PY14

