



**Eastern Kentucky C.E.P., Inc.  
Workforce Investment Area  
Local Area Plan  
(Modification April 30, 2009)**

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# Eastern Kentucky C.E.P., Inc. Local Plan

## I. Context, Vision, and Strategy

### a. Economic and Local Labor Market Context

*Provide a detailed analysis of the local economy, the local labor pool, and the local labor market context:*

In a report to the Kentucky Cabinet for Economic Development entitled **The Recent Economic Performance of Regions in Kentucky** (Coomes and Price, 2001) the authors state the following:

*“The economy of the mountain region to the east and south of Lexington differs greatly from other areas of the state. Its topography, infrastructure, industrial base, and culture are similar to that of adjacent areas of West Virginia and Virginia. There are no large cities, agriculture is limited due to the rugged terrain, yet the region is home to over 400,000 people. For most of the twentieth century, the primary industry was coal mining. The mountains are rich with a high energy, low sulfur form of coal. Both deep shaft and open pit forms of removal are used extensively there. Until the past few decades coal mining was a very labor-intensive business, and at its peak in 1950 coal mining employed around 50,000 people in Eastern Kentucky. Many others were employed in coal processing and transportation, and especially in the industries that served the miners and their families—grocers, banks, auto dealers, hardware stores, gasoline, and other retail. At the close of the century coal mining employed 20,000 in the Eastern Kentucky coalfields, as major advances in mining technology have reduced the demand for labor while coal production remained steady. Other important components of the region’s economy are forestry, light manufacturing, and tourism . . . The area has the lowest concentration of manufacturing jobs of any region in Kentucky. It also has the least household wealth and is most dependent upon federal and state income support programs. Kentucky state government has invested billions of dollars to dramatically improve the mountain road system and the local public schools during the past twenty years. Better physical access, the spread of satellite television reception, and more pervasive usage of computers and the internet has reduced the longstanding isolation of the region’s population and hopefully an end to its high levels of illiteracy, unemployment, dependency, and poverty.” (Coomes and Price, 2001: 7)*

Two things have occurred in the economy of the region since this report was written. First, beginning in 2004-2005 there has been a resurgence in coal

mining. This recovery has been stimulated by several factors: the growing global market for energy sources, especially in India and China; the continuing high price of petroleum; the demand for locally available energy; and the recognition that advanced technology may make it possible to expand the utilization of coal as a clean energy source. The U. S. Census data indicates that in the Eastern Kentucky C.E.P., Inc. (EKCEP) area from the fourth quarter of 2004 to the fourth quarter of 2005 employment in the coal mining industry rose 9.7 percent and mining employed more people than any other industry in the region (<http://lehd.dsd.census.gov>). Although the recent decline in the world wide price of petroleum has had a parallel effect on the price of coal, mining still remains a dynamic part of the eastern Kentucky economy, and is still the primary driver of the economic engine for the region and is eastern Kentucky's largest private sector employer. Secondly, eastern Kentucky, like all other parts of the nation, has been heavily impacted by the global economic recession. Although eastern Kentucky is not as industrialized as other parts of the state, manufacturing and other sectors in the region have suffered significant losses. A listing of Rapid Response activities in the area within the past year will emphasize this:

<b>Company</b>	<b>Location</b>	<b>Sector/Product</b>	<b># of Jobs Lost</b>
American Standard	Paintsville	Manufacturing--Plumbing	48
CDG Management	Paintsville	Call Center	75
Cintas / Perry Manufacturing	Hazard	Manufacturing-- Uniforms	150
CDG Management	Middlesboro	Call Center	75
Clear Creek Hardwood	Grayson	Manufacturing— Sawmill	37
Community Presents	Grayson	Healthcare—Adult Mental Health	50
CTA	Knox	Manufacturing— Auto Insulation	48
Dawahare's	Multiple	Retail--Clothing	55
Foodland	Louisa	Retail--Grocery	37
Goody's	Multiple	Retail--Clothing	45
Interstate Natural Gas	Pikeville	Energy—Natural Gas	100
JC Tech	Annsville	Manufacturing-- Electronics	15
Legend Suzuki	Knox	Retail—Auto Sales	30
Pikeville College	Pikeville	Education	25

<b>Company</b>	<b>Location</b>	<b>Sector/Product</b>	<b># of Jobs Lost</b>
TL Bayne Inc.	Paintsville	Manufacturing-- Furniture	75
Tru-Seal	Barbourville	Manufacturing— Window Seals	50
Weyerhaeuser - Trus Joist	Hazard	Manufacturing— Engineered Wood Products	165

The closure of manufacturing facilities in eastern Kentucky is especially disturbing. Historically, much of the manufacturing in the region has focused on low-skilled, low-paying jobs. Many of those who have lost employment in these facilities have low educational attainment and possess few skills that are marketable in newly emerging jobs. Re-employment for these individuals, who have a proven work ethic, poses a significant problem for the workforce development system of the region.

In such an environment, it is requisite upon all of the partners of the workforce development system to assist those who have lost their jobs in gaining the training they need to obtain re-employment. Additionally, it is equally important that the system devote significant effort toward layoff aversion strategies to promote the creation of a workforce in the region with the skills necessary to compete in the global 21<sup>st</sup> century workplace. We vaccinate our children; we take flu shots every year; and we perform preventive maintenance on our cars. By these actions we are affirming that the most economical way to deal with a problem is to prevent it before it occurs. Similarly the workforce development system needs to perform preventive maintenance on our workforce in eastern Kentucky by making a concerted effort to work with employers and training providers to raise the skill level of those still working in the region.

The magnitude of the education and training problem in eastern Kentucky is clear from demographic data from the region. According to the 2000 census, the EKCEP service region had a population of 484,006. Only 57.8 percent of those adults over age 25 had completed high school in 2000 compared with 74.1 percent state-wide. This statistic takes on a more ominous tone when one realizes that over four out of 10 adults in eastern Kentucky do not have a high school diploma or GED, and estimates are that over 70 percent of the jobs of the future will require some type of post-secondary education. The challenge to the workforce system is clear. If we are to put laid-off eastern Kentuckians back to work, and if we are to prevent further layoffs, all of the partners in the system must work together utilizing all of our available resources and creativity.

EKCEP, as the Local Workforce Investment Area, is in the best position of any regional agency to act as a clearinghouse for these efforts. Although Coomes and Price's Mountain Region was defined on the basis of economic, geographic, and cultural factors, and not on the existence of any public

sector service agency, it is worth noting the near congruence of the EKCEP service area and the Mountain Region. Of the 21 counties which they include in the Mountains, only Estill is not a part of the EKCEP area. Three counties—Knox, Lawrence, and Carter—are included in the EKCEP region but not in Coomes and Price’s Mountain Region. Nevertheless, EKCEP would appear to be the only organization with an opportunity to address economic issues specific to the Mountain Region as a whole. The EKCEP counties are served by nine different Community Action Programs ([www.kaca.org](http://www.kaca.org)) and five different Area Development Districts ([www.kycadd.org](http://www.kycadd.org)), none of which can provide the same level of regional interest and cohesiveness to programs that EKCEP can. EKCEP has also demonstrated a willingness to partner with broader based organizations such as the Center for Rural Development and the Kentucky Community and Technical College System (KCTCS) when it is consistent with meeting the region’s workforce development needs.

*b. Local Vision and Priorities*

Stated in the simplest terms, EKCEP sees its mission as twofold: to find jobs for people and to find people for jobs.

EKCEP accomplishes these two objectives through a solutions-based approach, in which it constantly evaluates the needs of eastern Kentucky’s job seekers and employers and redesigns and adapts its services to meet those needs. EKCEP is committed to using the full flexibility provided by the Workforce Investment Act to develop and customize services to best meet the unique needs of eastern Kentucky’s workers and businesses. The present economic downturn and the provision of American Recovery and Reinvestment Act (ARRA) funding to combat its effects have created a unique opportunity for the workforce development system to change itself to more effectively address the re-employment issue. By collaboratively working together, EKCEP and all of the other partners in the system have both the responsibility and the resources to engage and serve a much greater percentage of the dislocated workforce. EKCEP will place a high priority on transforming the manner in which the re-employment process works in eastern Kentucky.

EKCEP also acts as a broker to provide access to other training, and supportive services, and as a catalyst for partnerships within the workforce development system and between workforce development and private industry. EKCEP’s JobSight network of one-stop workforce centers and affiliated sites serve as the hub for many of these brokering and partnership activities throughout the EKCEP region.

The mission of the JobSight network is: “To strengthen our communities by providing workforce-relevant services for businesses and workers by creating partnerships that ultimately contribute to regional economic vitality, increased wages, higher education, and a better quality of life for the citizens of eastern Kentucky.”

Because of its JobSight partnerships with education, economic development, workforce services, and private industry, EKCEP is uniquely positioned to be the single point of contact for eastern Kentucky employers seeking assistance with workforce development and training services.

*1. What is the local vision for ensuring a continuum of education and training opportunities that support a skilled workforce?*

EKCEP strongly adheres to the position that lifelong learning is both a quality of life and a workforce readiness issue. Implicit in this is the vision of a workforce development system that supports and promotes this learning process. Given the projected requirements of the future workplace, attainment of a high school diploma or a GED must be viewed as the minimal acceptable educational level for the workforce. As the data quoted above indicates, the adult population of the EKCEP service region is severely hampered by low educational attainment, and this in turn means that the workforce of the region is far from ready for the challenges of the 21<sup>st</sup> century workplace.

Therefore, EKCEP's vision of its role in the continuum of education and training must begin with supporting and promoting the attainment of high school diplomas or GED's for both its youth and adult clients. Beyond attainment of this minimum level EKCEP focuses strongly on identifying and supporting those training and educational programs which lead to jobs in those sectors which are most important to the economic vitality of the region. Historically this has led to a focus on healthcare, manufacturing, and mining.

In order to prepare the workforce for changes in the workplace EKCEP emphasizes those programs which lead to portable certifications and which are part of defined career ladders. EKCEP also views raising the skills of the existing workforce as a significant way to support layoff aversion and to promote re-employment of those who unavoidably lose their jobs. Taking this approach will have three positive effects on the workforce and the economy of the region:

- It will promote the transition into the workforce of new workers.
- It will help to avert layoffs where possible by equipping the existing workforce with those skills necessary to allow their employers to compete in the global marketplace.
- It will ease the re-employment of those unavoidable layoffs by providing the workers with transferable skills which are relevant to the modern workplace.

The EKCEP ensures that the employment needs of local employers and participants are met by establishing customer feedback procedures, as well as by reviewing local labor market information. Employment needs of local employers are identified and met through a variety of means. The EKCEP Business Solutions Team is in frequent contact with employers and

workforce development partner agencies and programs throughout the service area and actively participates in business and employer organizations such as local Chambers of Commerce and regional Society for Human Resource Management meetings. Additionally Workforce Investment Act (WIA) service delivery staff throughout the region are trained to accept job orders from employers further enhancing their contact with and response to employer needs. As the employer's "single point of contact" in the workforce development system the EKCEP Business Solutions Team is in the best position to proactively identify and seek solutions to meet employer needs in the EKCEP service area.

As an additional tool in identifying the labor market needs of the region, EKCEP has recently commissioned a study to identify the specific training and employment needs in eastern Kentucky. This study will be completed by the end of the year and will provide up-to-date, region-specific information which will further assist in insuring that the training being provided by the workforce system is relevant to our service region.

Once training needs are identified, EKCEP is able to facilitate that training through a variety of means. EKCEP has established strong partnerships with the KCTCS institutions throughout its region, and is able to support KCTCS training through Individual Training Accounts (ITA's), short-term training programs, and WINS-funded employer-focused training programs. In addition EKCEP has utilized the services of other training providers as appropriate, such as customized programs supporting specific proprietary training. Within the framework provided by the American Recovery and Reinvestment Act (ARRA), EKCEP will also utilize the opportunity to fund specific classes to assist in the re-employment of dislocated workers. By remaining demand driven and solutions-based EKCEP can ensure that it is providing training which is both timely and relevant to the labor market.

*2. What is the local vision for ensuring that every youth has the opportunity for developing and achieving career goals through education and workforce training, including youth most-in-need of assistance, such as out-of-school youth, homeless youth, youth in foster care, youth aging out of foster care, youth offenders, children of incarcerated parents, migrant and seasonal farm worker youth, youth with disabilities, and youth at risk?*

EKCEP has designed its WIA youth programs to ensure that opportunities to develop and achieve career goals through education and workforce training are made available to as many eligible youth as the region's WIA funding will allow.

EKCEP and its contractors use a variety of means to ensure that those most in need of assistance are included among the youth served. Contractor staff maintain relationships with local school systems, foster-care institutions, homeless shelters and other public assistance programs and private charities to ensure that eligible youth in these institutions are aware of WIA services. Administrators and counselors at these institutions often make referrals to WIA. Specific program opportunities—especially those designed for out-of-

school youth—are often advertised through radio and print media, ensuring that a significant percentage of the eligible population is aware of them. The WIA youth programs that EKCEP provides with WIA formula funds focus on helping youth transition successfully into employment or postsecondary education. Youth program elements are designed to meet WIA performance goals and to address one or more of these three strategic objectives:

- Assist high school students who face barriers to scholastic success to successfully transition from high school to employment and/or postsecondary education.
- Assist out-of-school youth to overcome barriers and successfully transition into employment and/or postsecondary education.
- Assist youth enrolled in postsecondary education who are at-risk of not completing to successfully complete their academic program.

Because of this focus on transition into employment and postsecondary education, EKCEP serves youth between the ages of 16 and 21. Reflecting Kentucky's use of Common Performance Measures for WIA, EKCEP's youth programs serve either in-school or out-of-school youth, and do not observe distinctions between older and younger youth (since this distinction does not exist under Common Measures).

EKCEP believes youth programs should help participants overcome barriers to academic or career success, become aware of career and educational opportunities, make career and/or educational choices, understand ways to pursue the career and/or education of their choice, and succeed in pursuing their choices. Although they share some common elements, in-school and out-of-school Youth Programs have different emphases. In-school youth Program design focuses more on sustaining and focusing participants' efforts to succeed academically and broadening their awareness of the full range of career and educational opportunities that are available for them through academic success. The design of the out-of-school youth program—which serves participants who have already disengaged from academia—focuses more on short-term trainings that can lead quickly to employment and improved earning power, as well as on remedial education to correct any basic skills deficiencies that are a barrier to workforce success. Both programs use individualized service strategies that address the academic, occupational skills, and service needs of each participant.

Because of the statutory limitations on WIA youth services that may be provided with ARRA funds, EKCEP will design ARRA youth services to meet the needs of eligible youth ages 16 to 24 who need to attain work readiness in order to understand and compete in the job market. This program will provide only basic assessment, a work readiness curriculum, and work experience assignments to the majority of participants. As much as possible, work experience assignments will be age appropriate and will be related to the long-term career and educational interests of each participant. The ARRA funds will allow EKCEP to provide vastly expanded work experience opportunities and increased points of entry to workforce services. This is

especially true for the hard to reach out-of-school youth. EKCEP anticipates that summer employment will provide a point of entry for continued assessment, adult education, and advanced training for many of these youth that are otherwise disconnected and difficult to reach.

*3. Identify key workforce investment system priorities for the local workforce system and how each will lead to actualizing the local vision for workforce and economic development?*

The ARRA has provided an opportunity for EKCEP to refine and expand its vision of its role in the lives of the residents of eastern Kentucky and in the development of the economy of the region. Six specific workforce system priorities have been identified:

1. To positively impact the educational level of the workforce of the region. This will require the cooperation of all of the partners in the workforce development system, but will especially focus on supporting and promoting the activities of the Adult Education programs of the region.
2. To improve the re-employment process for those workers in the region who have lost their jobs. This will require assuring that all workforce system partners communicate with one another identifying those who have lost their jobs, effectively assessing their needs, and addressing the educational, training, or other issues which act as barriers to their re-employment. Additionally, improving the reemployment process will hinge upon effectively engaging a higher percentage of the dislocated workforce in the region.
3. To promote the transition of the region's youth into the workforce. Both in-school and out-of-school programs must focus on the development of real workplace skills and on creating the expectation of entry into the workforce by the region's youth. This will take a concerted effort by workforce system partners working with the employers and training providers in the region to identify and provide job appropriate training to the youth of the region.
4. To sustain the present workforce by supporting layoff aversion training and activities. Although re-employment is critical both to the individuals who unavoidably lose their jobs and to the economy of the region, averting those layoffs in the first place is preferable. EKCEP's business services program, working together with employers and training providers in the region, has focused much of its efforts over the past several years in raising the skills of the existing workforce. The promotion of a stable, growing economy in the region will demand that these efforts continue given the evolving nature of the 21<sup>st</sup> century workplace.
5. To support the economic development of the region by promoting the growth and development of small businesses, entrepreneurs, trades

people, and micro-enterprises. The abundance of empty spec buildings and underutilized industrial parks throughout eastern Kentucky attest to the fact that traditional economic development

activities are not sufficient to address the economic problems of the region. At the same time eastern Kentucky entrepreneurs, craftspeople, and small business owners continue to work to develop their businesses in the region. In the context of both its regular programs and its ARRA funded programs EKCEP will expand its efforts to support these types of home-grown economic development activities.

6. To support and promote the self-sufficiency of the eastern Kentucky workforce. The emphasis of the workforce development system must not focus merely on “getting a job.” Instead, the goal should be to equip our workforce with those skills that lead to jobs that permit our region’s families to be self-sufficient. For far too long eastern Kentucky has sold itself as a low-cost domestic alternative to offshoring jobs. As long as the educational attainment of the population is unreasonably low, there is almost no alternative to this, especially as the modern workplace requires more and more training and education. If there is anything which the present recession has taught us, it is that this is not a viable approach if the economy of the region is to grow, and if our people are to share in the lives which Americans desire. Therefore, EKCEP will devote its efforts to supporting the training and education of the residents of the region so that they will have the skills necessary for the 21<sup>st</sup> century workplace

### *c. Overarching Local Strategies*

*What strategies are in place to address the national strategic direction and the workforce development issues identified through analysis of the local economy and labor market?*

As stated above (Section I, Local Vision), EKCEP sees its basic mission as twofold: to find jobs for people and to find people for jobs. In pursuit of these objectives, EKCEP has roles as a broker that provides access to other workforce, training, and supportive services, and as a catalyst that develops and enables partnerships within and among workforce development and private industry—in addition to its role as administrator of WIA services for the region.

The overarching strategies that EKCEP has adopted to help fully realize its vision include:

- Being a solutions-based organization that responds to workforce needs as they arise by adapting, brokering services, leveraging resources, and providing creative responses to the specific and unique needs of eastern Kentucky job seekers and employers.

- Using the full flexibility provided by the Workforce Investment Act to adapt EKCEP services, programs, and partnerships to best meet the specific and unique needs of eastern Kentucky job seekers and employers.
- Defining and formalizing the re-employment process in the region.
- Promoting and supporting the improvement of the basic educational attainment of the workforce of the region.
- Being the single point of contact for eastern Kentucky employers seeking workforce-related services anywhere in the region.
- Continuing to promote the professional development of the workforce system staff in the region so that the residents of eastern Kentucky can be better served.
- Communicating a clear and focused explanation of the workforce system to the public.
- Increasing the “workforce intelligence” of employers, job seekers, and workforce staff.
- Administering the JobSight network of workforce centers in a way that will “strengthen our communities by providing workforce-relevant services for businesses and workers by creating partnerships that ultimately contribute to regional economic vitality, increased wages, higher education, and a better quality of life for the citizens of eastern Kentucky.”

*d. Service Delivery Strategies, Support for Training*

*Describe innovative service delivery strategies (present or future) to maximize resources, increase service levels, improve service quality, achieve better integration or meet other key local goals?*

Because of its culture of solutions-based adaptability and responsiveness, many of EKCEP’s services are innovative to a greater or lesser degree. The most innovative aspects of EKCEP’s services are its approach to business services, its emphasis on marketing and public information, and its commitment to training and elevating its front-line staff.

EKCEP actively markets its services to businesses, trying to surmount the common complaint that business does not know what the workforce development system is or what it does. EKCEP’s communications staff supports this effort by producing marketing materials and by publicizing successful business services through area media outlets. The overall goal is to make area businesses aware—through both direct contact and mass media coverage—of what EKCEP’s business services can do and has done for other businesses.

Solutions-based adaptability is another key aspect of EKCEP’s innovative approach to delivering business services. Rather than offering employers a menu of prefabricated services, EKCEP begins by asking businesses what they need. EKCEP then adapts services, leverages resources, calls on partners, and does whatever else is possible within the flexibility of the Act to create services that meet the employer’s need. The direct result is meeting

the businesses' needs; the ancillary results are credibility, relevance, and business-to-business endorsements.

One excellent example of this innovative approach in action is EKCEP's response to the workforce challenges faced by the coal industry. The coal industry approached EKCEP—as a result of the awareness created by active outreach and marketing—to ask for assistance with current workforce shortages. In response, EKCEP partnered with education, economic development, and other workforce entities to develop an array of services to help the coal industry replenish and train its workforce. Extending the effort, EKCEP also partnered with the West Kentucky Workforce Investment Board (WIB) in applying for and receiving a grant from the U.S. Department of Labor to support expanded recruitment and training of miners. The most innovative aspect of the grant-funded activities was EKCEP's "Success Xpress," a mobile classroom and training lab facility built into a 53-foot truck trailer. Equipped with actual electrical panels, a computer simulator, an eight-workstation state-of-the-art distance-learning lab, and emergency command center capability, this unique mobile facility makes it possible to deliver first class training to any mine, school, or other location in eastern Kentucky.

EKCEP's marketing and public relations activities help communicate the opportunities offered by the workforce system to the general public. Working through its websites, newsletters, promotional materials, paid radio advertisements, and a steady stream of press releases to newspapers and television outlets throughout the region, EKCEP keeps the capabilities and successes of its programs in the public eye.

One of the more innovative aspects of EKCEP's public information efforts is its series of "Success Stories" press releases. These are human interest stories of participants who have succeeded in changing their lives and careers with the assistance of the WIA program or partner programs in EKCEP's JobSight workforce network. EKCEP produces these feature stories in-house and distributes them in a ready-to-use format with high quality photos to newspapers through the region, where they appear regularly.

EKCEP has also demonstrated a commitment to staff improvement by providing opportunities for career advisors in the JobSight network to earn the prestigious Global Career Development Facilitator (GCDF) certification. During the past two years, EKCEP has made it possible for selected career advisors to take the 10-month certification course, which includes 120 hours of intensive training and personal study led by two nationally-certified instructors. The GCDF certified graduates are better able to serve their clients using specialized counseling and guidance skills learned in the training. EKCEP plans to continue to offer the annual course to educate and improve the capabilities of frontline staff.

## II. Service Delivery

### a. Local Governance and Collaboration

*1. Describe how the agencies involved in the workforce system interrelate on workforce, economic development, and education issues and the respective lines of authority?*

All of the agencies that are partners in the JobSight workforce network are represented on the EKCEP WIB and have the opportunity to collaborate and communicate with each other through meetings and other WIB activities. In addition, the EKCEP WIB regularly invites non-member employers and nonpartner agencies that affect or contribute to our mission to attend WIB meetings, where their input and collaboration is sought.

Also, the EKCEP Board of Directors—which serves as Chief Elected Official (CEO) under the provisions of Section 117(c)(1)(C) of the Act—is comprised of representatives of local businesses, elected officials, the poor, community agencies, and other elements of eastern Kentucky's population. This composition adds an additional layer of representation that provides input and guidance from communities throughout the region that EKCEP serves.

Additionally, a forum for collaboration and communication among front-line staff is provided by the regular JobSight staff meetings conducted at each comprehensive one-stop center in the JobSight network.

*2. Describe the steps the local area will take to improve operational collaboration of the workforce investment activities and other related activities and programs outlined in section 112(b)(8)(A) of WIA, at the local level (e.g., joint activities, memoranda of understanding, planned mergers, coordinated policies, etc.). How will the local board and agencies eliminate any existing local-level barriers to coordination?*

EKCEP will take the following steps in our local area to support, sustain, and improve collaboration between partner agencies and institutions that provide workforce services and investments to our local area. These include but are not limited to entities responsible for WIA, Wagner-Peyser Act, Unemployment Insurance (UI), Trade Act services, Registered Apprenticeship, KCTCS and Adult Education.

Step 1: EKCEP will support the efforts of the Local Re-employment Team to establish a transformative and unified local area process for connecting recipients of UI to workforce services.

Step 2: EKCEP will hire a Regional Re-employment Coordinator for the purpose of:

- Increasing the percentage of dislocated workers connecting to and receiving services from Kentucky's workforce system in eastern Kentucky.

- Improving the re-employment services offered to dislocated workers and job seekers in the EKCEP region; including the identification of barriers that hinder involvement with the workforce system.
- To develop and nurture a collaborative systemic approach that emphasizes customer service, clear communication, and strategic planning and implementation among the workforce system partners in eastern Kentucky.
- To align the re-employment efforts of the workforce system to regional economic development efforts, employer training needs, and high growth / high demand and emerging occupations in our region.

*b. Re-employment Services and Wagner-Peyser Act Services*

*1. Describe the One-Stop re-employment services the local area provides to Unemployment Insurance claimants and the worker-profiling services provided to claimants identified as most likely to exhaust their Unemployment Insurance benefits in accordance with section 3(c)(3) of the Wagner-Peyser Act.*

The Re-employment Team for the EKCEP area has proposed that all “A” claimants receiving UI benefits be referred soon after UI services begin to WIA staff and other appropriate JobSight One-Stop partners so that the full range of services of the workforce development system can be made available to them. Several changes in the requirements for UI “A” claimants are currently being implemented.

First, the UI specialist will initiate an appointment with each individual by phone or in person two weeks after the UI claim is filed to fully update the EKOS record. Initial assessment can begin at that time by the UI specialist in order to identify needs and make appropriate referrals not only to mandatory One-Stop partners, but to other agencies located at the JobSight One-Stop centers. Referrals could also be made to agencies that provide support services in the community, but are located outside the JobSight One-Stop career center.

A weekly orientation process is being considered and may be implemented at Office of Employment and Training (OET) offices/JobSight One-Stop centers to expand the possibilities for services early in the cycle of unemployment. This group activity will be voluntary and will include information about all JobSight One-Stop partners and services that are available to assist UI claimants with successful employment. Referrals can be made at this time. The orientation would allow motivated UI claimants to begin working with JobSight One-Stop staff to proceed toward staff-assisted core services and intensive services, as well as training that is appropriate for each individual to find the best job.

In addition to the update appointment, eligibility reviews with each UI “A” claimant will be required four weeks after the initial UI claim is filed. The

client must meet with the UI specialist in person for the eligibility review, where additional assessment and referrals may be identified and initiated. On-going appointments for eligibility review will be required every eight weeks thereafter. This process is being implemented in order to identify needs for the UI claimant early in the cycle and to provide assistance for employment, thereby reducing the number of weeks of UI payments required.

Referrals to WIA staff may include additional assessment conducted by individuals certified as GCDF career facilitators. The JobFit is a specialized assessment used by GCDFs that facilitates opportunities for employment. Since 2003 EKCEP has made the JobFit assessment system available at no cost to all job seekers and employers within the service region. This online system is designed to match potential employees with employers and has over 22,000 job seekers in its data base and can be a valuable tool in connecting job-seekers and employers.

UI claimants may also receive intensive services including a range of workshops to help with work readiness to improve chances for employment. The UI worker-profiling system is being reinstated beginning June 1, 2009. The University of Kentucky provides the profiling to identify UI claimants who are most likely to exhaust their claim. UI claimants who are identified through this process must attend a "You're Hired" workshop to improve skills for job search, job applications, resumes, interviewing skills, and networking. JobSight One-Stop partners work together to provide this workshop to UI claimants who have been selected through the profiling system, as well as others who want to attend.

An additional specialized workshop is also available. In 2008, EKCEP began offering the Work Certified program to job seekers in Pike County. This is an intense three week, 90 hour, modularized training program which teaches a whole range of job-readiness skills to job seekers. The class is taught in a workplace style environment and is of value to both first time job seekers and to those seeking re-employment. Expansion of the Work Certified program is currently being implemented throughout the region.

*2. Describe how the local area will ensure the three-tiered service delivery strategy for labor exchange services for job seekers and employers authorized by the Wagner-Peyser Act includes: (1) self-service, (2) facilitated self-help service, and (3) staff-assisted service, and is accessible and available to all customers at the local level.*

Labor exchange services are available to jobseekers through at all three levels. Self-service labor exchange services may be accessed by job seekers through self registration on the EKOS system at the [www.oet.ky.gov](http://www.oet.ky.gov) portal. Job seekers can connect to this system from any location with a computer that has internet capabilities. The possibility of a technology based assessment of initial needs has been discussed that would be integrated in the self registration process for job seekers on the EKOS system. ARRA funds may be used to implement this additional service that would identify

and suggest referrals to JobSight One-Stop partners for needed services early in the cycle of unemployment. All OET offices and JobSight One-Stop centers in the EKCEP service region have resource rooms equipped with up-to-date computers and broadband internet services. Facilitated self-help service and staff-assisted services are available to job seekers through these computers in the resource rooms. JobSight One-Stop partner staff, including OET Wagner-Peyser staff and WIA staff, can provide assistance to job seekers when needed and as staff is available. The hiring of additional staff through Wagner-Peyser is being discussed in order to meet increased resource room traffic in OET offices and JobSight career centers.

EKCEP currently has a local WIA staff presence at JobSight One-Stop comprehensive sites, affiliate sites and access points in all 23 counties in the region. All of EKCEP's contractors have designated business services representatives that act as connections between the employer community and the workforce development system. Career advising services provided by WIA staff are significantly enhanced by EKCEP's commitment to the GCDF training program for its career advisors and local management staff.

EKCEP has also developed an interactive web site available at [www.jobsight.org](http://www.jobsight.org) with links to services for both job seekers and employers. Additional functionality including career profile videos and tips for jobseekers are included in an "On-Line Resource Room" for job seekers.

#### *c. Adult and Dislocated Worker Services*

##### *1. Describe local strategies and policies to ensure adults and dislocated workers have universal access to the minimum required core services, as described in section 134(d)(2).*

As noted above EKCEP has four One-Stops and additional access points serving all 23 of its service counties. All One-Stops in the EKCEP service region have resource rooms open to all job seekers. Computers with accessibility hardware and software are present in all resource rooms so that individuals with disabilities can utilize these resources. When staff assistance is requested or needed, WIA personnel are available at both the One-Stops and access points.

To aid in linking job-seekers with employers EKCEP makes the JobFit assessment system available to all job-seekers and employers throughout the region at no cost. Over 150 employers in the area are enrolled in the JobFit system and almost 23,000 job-seekers have taken the assessment and are in the JobFit database.

Over the past four years EKCEP has sponsored GCDF training for 80 WIA staff in the region. The goal of this process has been to prepare the

workforce development staff to meet the needs of the job-seekers and employers in the region.

*2. Describe how the local area will integrate resources provided under the Wagner-Peyser Act and WIA Title I for adults and dislocated workers, as well as resources provided by required One-Stop partner programs, to deliver core services.*

EKCEP will work with its One-Stop partners to integrate resources to adults and dislocated workers. Resource rooms provide staff to assist adults and dislocated workers as well as computers for clients to use. Adults and dislocated workers may utilize resources through self-service or may request staff-assisted core services, when available, such as intake, initial assessment of skills, job search and placement assistance, labor market information, information and referral for partner services, referral to supportive services providers such as child care and transportation, and others. Weekly group orientation sessions are being proposed in the Re-employment Teams that would integrate the information and referral process for adults and dislocated workers and would be provided through JobSight One-Stop partners including Wagner-Peyser, WIA and others.

JobSight One-Stop partners, including Wagner-Peyser and WIA Title I-B, integrate resources for staff, computers and other needed components to provide the best experience possible for adult and dislocated workers in the JobSight comprehensive One-Stop career center. Other JobSight One-Stop partners may also assist and are on site to accept referrals for additional needed services for each individual. Additional positions funded by Wagner-Peyser are being considered to assist in the resource rooms for initial assessment, information, and referral to other partners or supportive services. This is especially important as traffic has increased in the resource rooms due to heavy layoffs in the declining economy.

Technology based tools that would be used for initial assessment are being considered for implementation. The additional assessment module could be integrated into the EKOS self-registration process. This would add to capabilities of the JobSight One-Stop system to offer core level self-service opportunities to help determine referral needs earlier in the cycle for services to Unemployment Insurance claimants and other unemployed or underemployed adults.

Wagner-Peyser and Veterans Program staff as well as Business Services Representatives funded through WIA may also provide job match and referrals integrated through the EKOS system, provided they are trained to do so. They can also provide job development for job seekers or employers, as appropriate.

*3. Describe the local area's vision for increasing training access and opportunities for individuals including the investment of WIA Title I funds and the leveraging of other funds and resources.*

In its vision to be demand-driven and solutions-based EKCEP focuses on the development of partnerships which answer the needs of both the job seeker and employer customers of the workforce development system. A crucial aspect of EKCEP's business services program has been the development of partnerships which have not only facilitated the development of a wide variety of training programs but have also allowed EKCEP to leverage its WIA funds with other resources to vastly increase the reach of its WIA funding. For example, by partnering with the KCTCS system, EKCEP is participating in training worth over \$3.4 million dollars at a cost of slightly over \$1.0 million dollars in WIA funding. Similarly, by partnering with the Indiana-Kentucky Regional Council of Carpenters(IKRCC) EKCEP is able to assist those participating in apprenticeship programs in carpentry and millwright training. The IKRCC is providing the training at no cost to the participants; when not in class they are employed in paid work; and EKCEP is providing supportive services to assist with the purchase of tools, work clothes, and work permits. The fostering of partnerships is a focal aspect of EKCEP's vision for increasing the accessibility and affordability of training in the region.

*4. What models/templates/approaches does the local area recommend and/or require for service delivery in the One-Stop Career Centers in the area? For example, do all Centers in the area have a uniform method of organizing their service delivery to business customers? Is there a common individual assessment process utilized in every area Center? Are all area Centers required to have a resource center that is open to anyone?*

EKCEP contracts with the local Community Action Programs throughout its service area to deliver WIA services. Although there is a great deal of similarity in these programs across the area, differences do exist in terms of local non-WIA services, facilities, and organizational structure. However, within that context, EKCEP works to insure that there is as much uniformity as reasonably possible. For example the EKCEP Business Services Director coordinates business activities throughout the entire region through a group of local business service representatives. Similarly guidance and direction, but not direct supervision, for youth, adult, and dislocated worker programs are also provided from the EKCEP central office. A number of traits or services characterize the WIA services throughout the entire service area:

- The "JobSight" brand is promoted area-wide.
- The JobFit assessment is utilized in the entire area.
- "Work Certified" instructors are present throughout the region.
- GCDF certified career advisors have been trained in every contractor area.
- All One-Stops have resource rooms.
- On a quarterly basis all WIA staff from the entire region are brought together to promote communications and a common vision.
- All business services staff meet quarterly to share information and promote best-practices.

- All contractors provide a uniform quarterly report to EKCEP with a common set of deliverables identified in their contracts.

*d. Youth Services*

*Describe the local area’s strategy for providing comprehensive, integrated services to eligible youth, including those most-in-need.*

EKCEP has designed its WIA youth program to ensure that opportunities to develop and achieve career goals through education and workforce training are made available to as many eligible youth as the region’s WIA funding will allow.

EKCEP and its contractors use a variety of means to ensure that those most in need of assistance are included among the youth served. Contractor staff maintain relationships with local school systems, foster-care institutions, homeless shelters and other public assistance programs and private charities to ensure that eligible youth in these institutions are aware of WIA services. Administrators and counselors at these institutions often make referrals to WIA. Specific program opportunities—especially those designed for out-of-school youth—are often advertised through radio and print media, ensuring that a significant percentage of the eligible population is aware of them. Distinctions exist between the youth services EKCEP will provide under WIA formula funding and the services that will be provided with the WIA funds included in the American Recovery and Reinvestment Act (ARRA), as explained below.

**Youth Activities Under WIA Formula Funding**

EKCEP’s WIA Youth activities are designed to meet WIA Common Measures performance goals and to address one or more of these three strategic objectives:

- Assist high school students who face barriers to scholastic success to successfully transition from high school to employment and/or postsecondary education.
- Assist out-of-school youth to overcome barriers and successfully transition into employment and/or postsecondary education.
- Assist youth enrolled in postsecondary education who are at-risk of dropping out to successfully complete their academic program.

Because of this focus on transition into employment and postsecondary, EKCEP serves youth between the ages of 16 and 21. Reflecting Kentucky’s use of Common Performance Measures for WIA, EKCEP’s youth programs serve either in-school or out-of-school youth, and do not observe distinctions between older and younger youth (since this distinction does not exist under Common Measures).

*In-School Youth:* EKCEP will serve in-school youth with a variety of services that help participants overcome barriers to academic success, become aware of career and educational opportunities, make career and/or educational choices, understand ways to pursue the career and/or education of their choice, and succeed. Although the specific elements vary slightly between the contractors that run the programs within the EKCEP local area, the in-school youth programs will offer a wide variety of services that include career exploration, job shadowing, workforce readiness, postsecondary education options, financial aid application assistance, college campus visits, leadership development activities, skills-based activities, and community service projects, as well as providing access to the 10 elements required under WIA (based upon individual need):

1. Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies;
2. Alternative secondary school offerings;
3. Summer employment opportunities directly linked to academic and occupational learning;
4. Paid and unpaid work experiences, including internships and job shadowing as provided in §664.460 and §664.470;
5. Occupational skill training;
6. Leadership development opportunities, which include community service and peer-centered activities encouraging responsibility and other positive social behaviors;
7. Supportive services, which may include the services listed in §664.440;
8. Mentoring for a duration of at least 12 months that may occur both during and after program participation;
9. Follow-up services, as provided in §664.450; and
10. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.

EKCEP program staff will work closely with contractors to implement a framework for youth services that:

- Effectively connects eligible youth to services.
- Provides a thorough review of academic, occupational skill, and service needs of each youth.
- Provides an individualized service strategy for each youth that includes age-appropriate career goals and elimination of barriers.
- Integrates WIA services with appropriate community services and employer needs.

*Out-of-School Youth:* EKCEP serves out-of-school youth with a variety of services that help participants overcome barriers to entering and succeeding

in the workforce. Throughout EKCEP's service area, contractors develop custom-written versions of the out-of-school youth program that are based on local career opportunities and employers' needs and the short-term trainings that will prepare young job seekers to meet those needs and fill those jobs. Each of these programs will include elements that help participants overcome barriers to employment success, understand available career and educational opportunities, make career and/or educational choices, and access the training and/or education to pursue that choice. The programs will also include educational and life-skills elements that are relevant to workplace success. Tutoring and classes will be provided to participants who are basic skills deficient. Work experience placements will be used both to introduce and acclimate participants to the world of work and to give them experience in specific career fields or with specific employers that match their immediate career goals.

The 10 elements required under WIA (listed above) are also made available to out-of-school youth, based upon individual need.

Although it does not exclude other options, the emphasis of the out-of-school youth program will be on real local employment opportunities and the short-term skills development that qualifies participants to take advantage of those opportunities.

### **Youth Activities Under ARRA WIA Funding**

EKCEP's WIA youth services provided with ARRA funds will serve a wider range of clients with a much narrower range of services, conforming to the intent and requirements of the ARRA. This program will provide only basic assessment, a work readiness curriculum, and work experience assignments to the majority of participants, who may range from 16 to 24 years of age. The two performance goals for these participants are to achieve work readiness and to complete their program activities.

In cases where case management staff believe participants need and could benefit from a wider range of services, those participants may also be enrolled in other WIA services under WIA formula funding.

#### ***e. Veterans' Priority of Service***

*What policies and strategies does the local area have in place to ensure that, pursuant to the Jobs for Veterans Act (P.L. 107-288) (38 USC 4215), priority of service is provided to veterans (and certain spouses) who otherwise meet the eligibility requirements for all employment and training programs funded by the Department of Labor?*

EKCEP will update client policies for WIA employment and training services to address all priority of service guidelines for veterans and eligible spouses. In addition, EKCEP will also conduct training to its contractors to inform staff and implement the policies and procedures throughout JobSight One-Stop career centers in eastern Kentucky. A fact sheet and a questionnaire for determining

priority of service for veterans and eligible spouses will be utilized in the training.

*f. Service Delivery to Targeted Populations*

*Describe the local area's strategies to ensure that the full range of employment and training programs and services delivered through the state's One-Stop delivery system are accessible to and will meet the needs of dislocated workers, displaced homemakers, low-income individuals, migrant and seasonal farm workers, women, minorities, individuals training for non-traditional employment, veterans, public assistance recipients and individuals with multiple barriers to employment (including older individuals, limited English proficiency individuals, and people with disabilities).*

The 23-county EKCEP local area is rural, has a high poverty rate, a high rate of individuals receiving public assistance, and low rates of literacy and high school completion. It is unlikely that EKCEP's adult funds allocated to the area will be sufficient to meet the need or fulfill the demand for some intensive and training services.

EKCEP has established a process to provide priority to adults that are recipients of public assistance and that meet low-income guidelines for the intensive services identified below and for all ITAs.

Core services will be universally available to adults and subject only to regulatory requirements regarding selective service registration, citizenship, and immigration.

Intensive services, other than those listed in the following paragraph, shall also be available to all job seekers; however, veterans are given priority of service.

EKCEP has determined that funding for the following intensive services are limited.

- Work experience
- Job search assistance
- Relocation assistance

The services bulleted above are available only to individuals who are receiving public assistance or whose family income does not exceed the low-income guidelines for urban areas as set forth by the Department of Labor. Veterans will be given priority of service within this group.

ITA training services are limited to individuals whose family income is equal to or less than the income threshold established by EKCEP. This threshold is expressed as a percentage relative to the lower living standard income level (LLSIL).

Individuals are selected to receive an ITA using a weighted scale that gives

first priority to veterans and then to individuals whose family income does not exceed the poverty income guidelines. This priority is awarded only after an individual has otherwise qualified himself or herself for an ITA based on EKCEP policy.

The strategies described above are for adult clients only. Dislocated workers and displaced homemakers that qualify for intensive services, an ITA, or other training services according to EKCEP Policy are provided services on a first come first serve basis. Contractors are required to notify EKCEP when a lack of funding prevents qualified dislocated workers from receiving WIA services.

In addition to the strategies employed above: EKCEP shall pursue a full compliment of partners within its network of services to ensure that a full range of employment and training programs and services are accessible to and will meet the special needs of dislocated workers, displaced homemakers, low-income individuals, migrant and seasonal farm workers, women, minorities, individuals training for non-traditional employment, veterans, public assistance recipients and individuals with multiple barriers to employment (including older individuals, limited English-proficiency individuals, and people with disabilities).

### **III. Operations**

#### *a. Transparency and Public Comment*

*Include a description of the process the local area used to make the Plan available to the public and the outcome of the local area's review of the resulting public comments.*

The draft version of the EKCEP Local Area Plan was posted on the EKCEP website ([www.ekcep.org](http://www.ekcep.org)) for a public comment period of two weeks, beginning June 1, 2007. Public comments were accepted through an e-mail link provided on the website.

No public comments were received.

In April the public was made aware that EKCEP intended to extend its Local Area Plan through June 30, 2010. The modified Local Area Plan will be posted on EKCEP's website for public comment for a period of one month from May 1, 2009, through June 1, 2009. Public comments will be accepted through an e-mail link provided on the website. If comments require significant changes in the plan, additional modifications may be submitted.

#### *b. Increasing Services for Universal Access*

*What local policies are in place to promote universal access and consistency of service throughout the area?*

EKCEP's Client Policies describe the core services available to the public. These core services are provided throughout our service area. WIA funded staff and JobSight partners, as appropriate, may deliver core services. These policies promote universal access and provide consistency of service throughout our area. To view EKCEP's client policies go to: <http://www.ekcep.org/policyrevisions.htm>

*c. Local Planning Process*

N/A - Not included in local area instructions.

*d. Procurement*

*Describe the competitive and non-competitive processes that will be used at the local level to award grants and contracts for activities under Title I of WIA, including how potential bidders are being made aware of the availability of grants and contracts.*

EKCEP will procure property and services in a manner that provides open and free competition to the maximum extent practical by following the Eastern Kentucky Concentrated Employment Program, Inc. Procurement Procedures and the Code of Federal Regulations 29 (CFR) Part 97.36.

The EKCEP Procurement Procedures define the procedures, safeguards, and recordkeeping requirements for the methods of procurement that EKCEP may use in purchasing goods and services and awarding contracts. The procurement methods used by EKCEP include:

- Small Purchase Process, which includes categories for items that cost:
  - \$500 to \$4,999.
  - \$5,000 to \$19,999.

The quote-gathering and documentation requirements for each of these categories are described in detail in EKCEP's Procurement Policies.

- Competitive Sealed Bids Process, which applies to purchases of \$20,000 or more, as delineated in CFR 97.36(d)(2). Specific requirements for advertising for bids, evaluating bids, and awarding contracts in this category are described in EKCEP's Procurement Policies.

When the competitive sealed bids process is used, EKCEP will advertise its request to receive sealed bids in the Lexington Herald-Leader newspaper and on the EKCEP website. Other local, regional, or state circulated papers may be used if deemed necessary to attract adequate competition.

- Competitive Proposal Process, which applies to purchases of \$20,000 or more and requires a "request for proposals" (RFP). These proposals most

often result in a cost-reimbursement contract. However, the policies allow EKCEP to award a fixed-price contract when appropriate. Specific requirements for preparing the request, publicizing the request, evaluating the proposals, and awarding contracts in this category are described in EKCEP's Procurement Policies.

When the RFP process is used, EKCEP's request will be publicized by publication for a minimum of two days in the Lexington Herald-Leader's Legal Notice section and by postings on EKCEP's website during the open time frame of the solicitation. Notification of the RFP will also be sent to current pre-qualified lists of potential bidders to ensure open and free competition.

RFPs shall either:

- 1 Have a defined response deadline, after which all respondents to the RFP will be evaluated together; or
- 2 Have an undefined deadline, or a "rolling time frame," during which respondents to the RFP will be evaluated on a rolling basis.

RFPs will be evaluated and contracts will be awarded according to the RFP specifications and written selection procedures to responsible firms whose proposals are most advantageous to EKCEP and its purposes with price and other factors being considered.

- Non-Competitive Proposals or Negotiations Process, which is limited to use in specific circumstances when:
  - Other procurement methods are not feasible or appropriate.
  - The services of a licensed professional are being purchased.
  - A contract for certain types of insurance is being purchased.

Details about the specific circumstances in which non-competitive proposals or negotiations may be used, examples of the types of licensed professionals whose services qualify, and examples of the types of insurance purchases that qualify are described in EKCEP's Procurement Policies.

EKCEP will take affirmative steps to ensure that minority firms, women's business enterprises, and labor surplus area firms are used as providers when possible. EKCEP will place known and qualified small and minority businesses and women's business enterprises on solicitation lists and ensure that these groups are solicited whenever they are potential sources for procured services.

EKCEP's selection of service providers will be accomplished in an unbiased manner and in compliance with the Workforce Investment Act and the regulations. Awards will be made to organizations possessing the demonstrated ability to perform successfully under the terms and conditions of a proposed sub-grant or contract. Details about the factors that shall take into consideration to determine demonstrated ability are provided in EKCEP's Procurement Policies.

Any protests, disputes of decisions, or claims arising from EKCEP's procurement activities will be handled via a process that includes the filing of a official protest and a hearing to review the procurement process and the reasons the proposal was not selected. The hearing will determine whether any corrective action should be taken. Details of the protest and hearing processes are contained in EKCEP's Procurement Policies.

*e. Technical Assistance*

N/A - Not included in local area instructions

*f. Monitoring and Oversight*

*Describe the monitoring and oversight criteria and procedures utilized by the local area.*

Monitoring is the process by which EKCEP, under the direction of the local WIB, determines whether contractors are in compliance with the provisions of the Act, contract terms, and the applicable State and Federal regulations. Monitoring provides a comparison of planned outcomes versus actual outcomes.

The monitoring process may include activities such as:

- Inspection of supporting documentation to ensure adequacy and accuracy.
- Comparing expenditures to contract limits.
- Writing reports and recommending corrective action.

EKCEP uses two monitoring methods: •

- Desktop monitoring
- On-site monitoring

EKCEP's financial system will ensure that the agency, as well as any contractors, will provide fiscal controls and accounting procedures that are:

1. In accordance with generally accepted accounting principles and financial systems. These procedures shall include:
  - Information pertaining to sub-grant and contract awards, obligations, un-obligated balances, assets, expenditures, and income.

- Effective internal controls to safeguard assets and assure their proper use.
- A comparison of actual expenditures with budgeted amounts on each sub-grant and contract.
- Source documentation to support accounting records.
- Proper charging of costs and cost allocation.

2. Sufficient to:

- Permit preparation of required reports;
- Permit the tracing of funds to a level of expenditure adequate to establish that funds have not been used in violation of the applicable restrictions on their use.

Desktop monitoring and on-site monitoring is performed on accounting systems to ensure that all requirements are met. The ability of contractors to execute proper fiscal controls will be determined before contracts are awarded. Technical assistance is provided to contractors and training sessions may be provided as necessary. Cost principles, allowable costs, and cost clarification/limitations under the Act and applicable regulations will be viewed in the procurement and budgeting process.

Desktop monitoring is performed by staff of EKCEP's JobSight Services Department, Accounting Department, and Office of the Director. This type of monitoring consists of reviewing reports, invoices, and other information received from contractors and field offices and the internal reports generated by accounting, and other administrative staff.

Reviewing these reports may reveal a need for technical assistance, on-site monitoring, or required corrective action. When a staff member identifies a problem area during desktop monitoring, the staff member immediately notifies the Office of the Director in writing. The Office of the Director then schedules an on-site monitoring visit by appropriate staff.

**On-Site Monitoring:** On-site monitoring involves a staff member (or members) traveling to the site to see firsthand if the operation is in compliance with program and/or contract requirements. This staff monitor (or monitoring team) examines documents, determines if training requirements are being met, reviews accounting practices and other programmatic and financial records using monitoring tools developed for the specific contract or activity.

When an on-site monitoring visit is completed, the monitor conducts an exit interview, fully explaining any findings and recommendations to the contractor. The monitor (or team) then prepares a written report of findings and any recommendations. A prepared format developed specifically for the monitoring system is used in preparing the report. This report is prepared and distributed within 10 working days after the visit. All reports are sent to the appropriate administrative staff, who review the report and take any necessary action. The original copy of each report is sent to the contractor's director.

If corrective action is required by a monitoring report, the contractor must prepare a corrective action plan detailing the action to be taken. In these cases, the following procedure is followed:

1. The contractor must send the corrective action plan to the appropriate monitor within the period designated in the monitoring report. (If required, the monitor may provide technical assistance to the contractor in preparing the corrective action plan.)
2. Upon receiving the corrective action plan, the monitor reviews the response to determine whether it is acceptable. If the monitor determines that the plan is unacceptable, the monitor will provide the necessary technical assistance to the contractor within 10 working days.

After a corrective action plan has been approved by the monitor (or monitoring team), the contractor should implement the plan immediately. The monitor makes a follow-up visit. On this visit, the monitor determines whether the corrective action plan has been implemented properly. The monitor then prepares a report of the follow-up findings. This follow-up report is distributed to the appropriate contractor staff and central office staff.

*g. Accountability and Performance*

N/A - Not included in local area instructions.