Monitoring PY22 Year-in-Review

Welcome!

Welcome to the second edition of the Indiana Department of Workforce Development's (DWD) Year-in-Review (YIR). The Program Year (PY) 2022 YIR has been expanded to include statewide aggregated review outcomes from not only from Workforce Innovation & Opportunity Act (WIOA) Title I, but also Reemployment Services and Eligibility Assessment (RESEA) and the Apprenticeship State Expansion (ASE) Grant, as well as a summary of DWD policy and technical assistance issued in PY2022. The expanded edition provides our local workforce development area (LWDAs, Regions) partners with pertinent, useful information to further the goal of continuous improvement. The aggregated information contained here can be used to support staff development; enhance subrecipient oversight and monitoring activities; refine service delivery models to be more efficient and effective; strengthen collaboration between partners; ensure local policies contain all required content; and cultivate new ideas. The YIR provides an opportunity to learn from the data, other regions, and from the monitoring process itself.

As Regions review PY2022 statewide review outcomes, DWD encourages reflection on the relationship between their own WIOA compliance review outcomes and their performance metrics and to see how these two data sets correlate.

Looking at individual regions' performance across the state tor PY2022 Q4, the majority of regions did not attain their negotiated measures for the Employment Q2 or Employment Q4 metrics for one or more their WIOA programs (Adult, Dislocated Worker, Youth). Similarly, 60% of statewide monitoring outcomes focused on WIOA program implementation were related to case management issues. Such issues included inconsistent assessment processes (41%), assessment processes not thoroughly identifying/addressing people's barriers which may impact their employment from Q2 to Q4 (15%), and problems with exit and follow-up procedures that may make communication with exited clients challenging (18%). Other issues identified through compliance reviews that relate to performance metrics include identification of errors related to documentation supporting credentials and measurable skill gains. Stay tuned for upcoming DWD guidance surrounding data integrity, which is being developed to address common questions and observations identified in WIOA compliance reviews.

Discussions with each of the Regions identified a unilaterally strong desire to support their clients in achieving their goals for obtaining and retaining employment. DWD applauds all Regions' leadership and staff dedication to their local missions and the desire to make improvements to their operations. As Regions identify challenging issues through their internal review of case management practices and subrecipient monitoring, DWD encourages Regions to reach out to DWD with their needs for technical assistance. DWD can provide needed support and can also connect regions with other regions that have had success dealing with similar issues. Taking such action will support Regions' ongoing commitment to providing excellent client-centered services, and likely result in better compliance review outcomes and performance metrics.

WIOA Title I – Comparing PY21 & PY22 Review Outcomes

PY21 vs PY22 REVIEW OUTCOMES
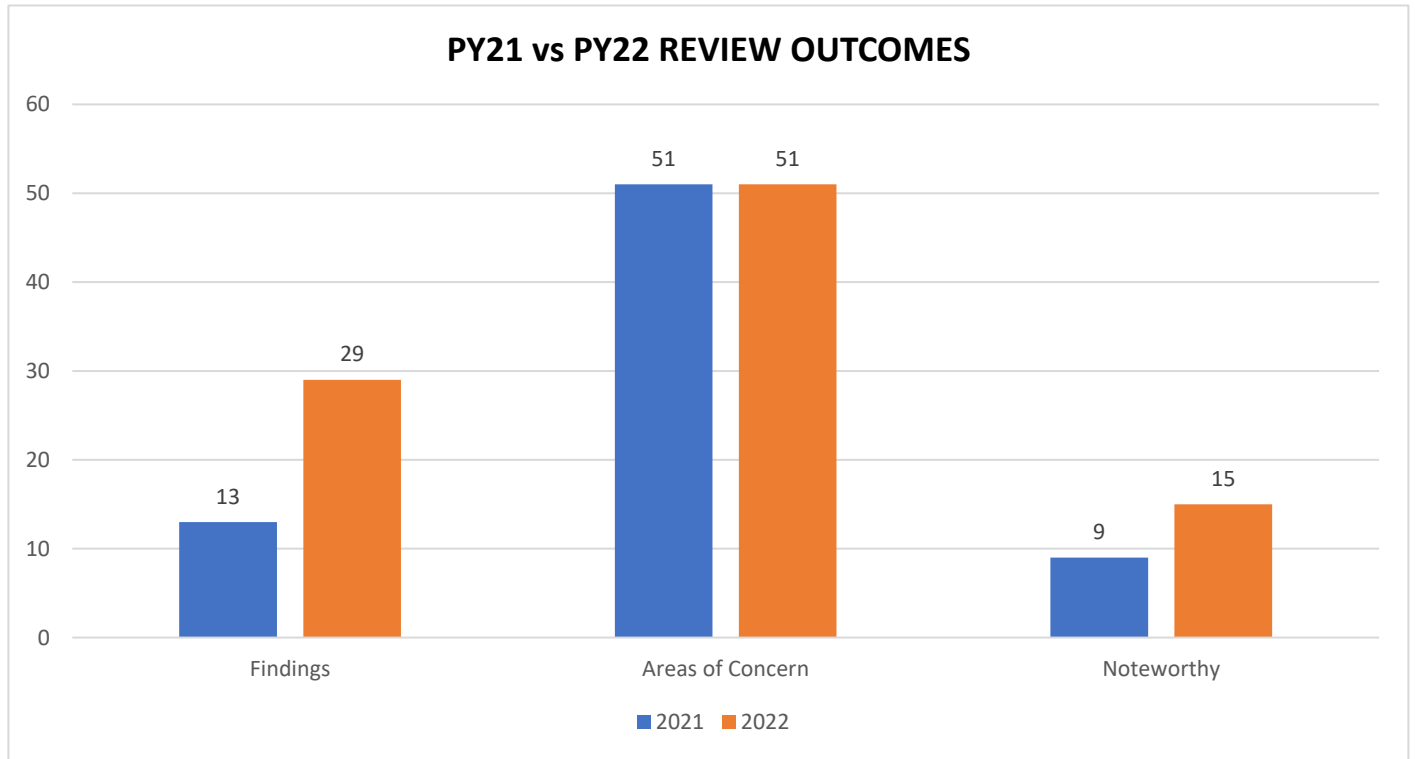
- Four regions' PY21 Areas of Concern (AOCs) became Findings in PY22. AOCs are designed to bring awareness to issues that could potentially become findings if not addressed.
  - Many of these were Equal Opportunity (EO) related.

- Three regions had repeat Findings from PY21 to PY22.
  - Repeat findings were Fiscal/Admin, EO, and Program related.

- Ten regions had repeat AOCs from PY21 to PY22.
  - Most of the repeat AOCs were Fiscal/Admin related.

- Types of repeat issues included:
  - Governance Documents
  - Lack of Employment Recovery-Dislocated Worker Grant Expenditures/Enrollments
  - Lack of EO Assurance Language
  - Lack of EO Monitoring

WIOA Title I PY2022 Review Outcomes

Compliance Findings. Items identified as non-compliant with federal, state, or local regulations, policies, or procedures shall be classified as Findings. Compliance Team staff provides citations from appropriate authorities, identifies specific areas of non-compliance, and prescribes the corrective measures necessary for resolution.

Areas of Concern (AOCs). Items that may or may not be compliance-based but may impede effectiveness and efficiency of service delivery to individual and business clientele shall be classified as Areas of Concern. Reports may offer recommendations to the Local Area in making qualitative improvements or may make a referral to appropriate DWD staff for technical assistance.

Noteworthy Efforts. New, unique, significant, or innovative initiatives and results, and/or notable or exemplary practices shall be classified as Noteworthy Efforts. Noteworthy efforts highlight areas where regions are excelling in their efforts to serve their communities by implementing new, unique, significant, and innovative ideas. While there were many positive practices across the state, the ones listed below were worth noting and sharing with other regions.

PY2022 Outcomes by Subject Area
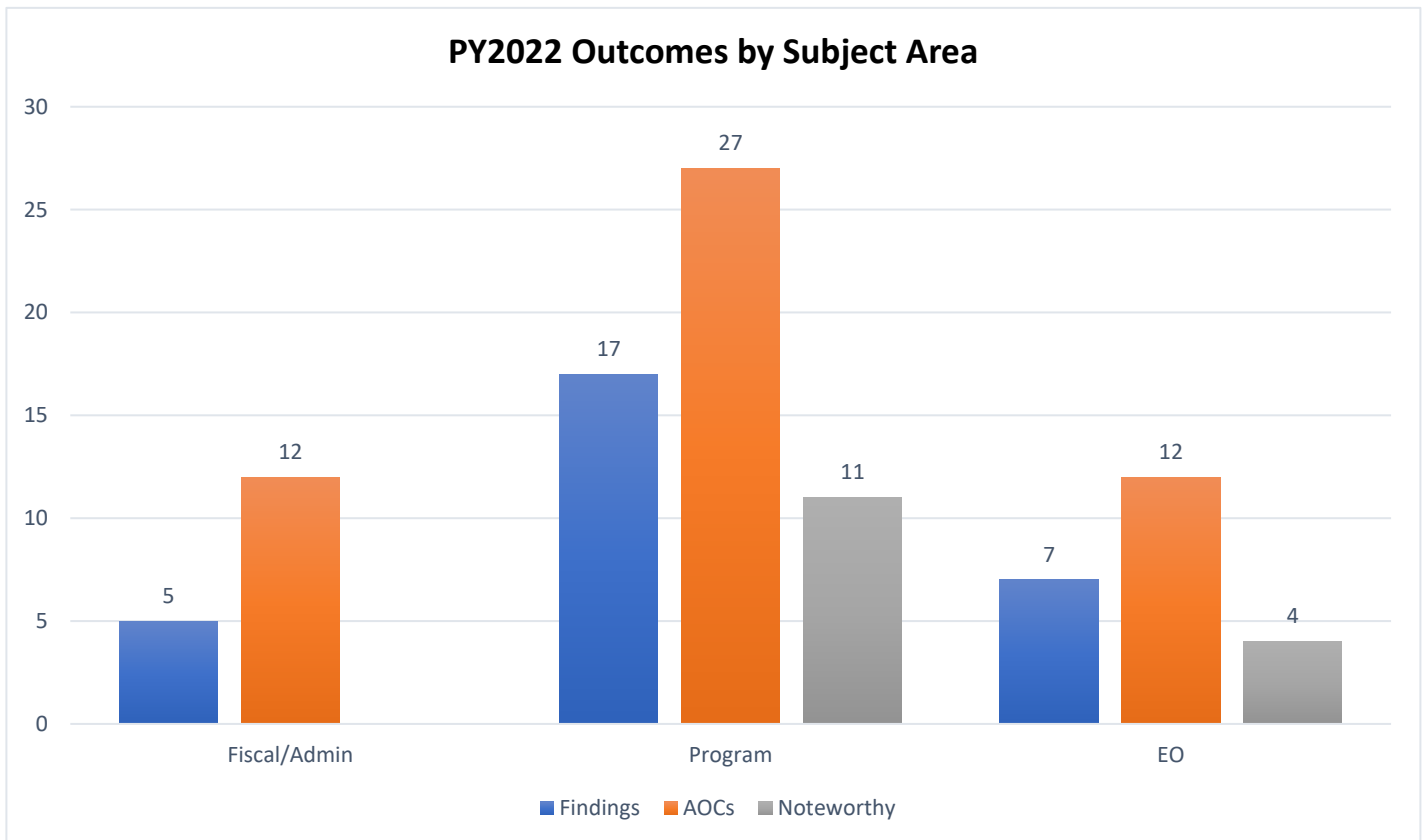
PY2022 Fiscal &Admin-Related Areas of Concern/Findings
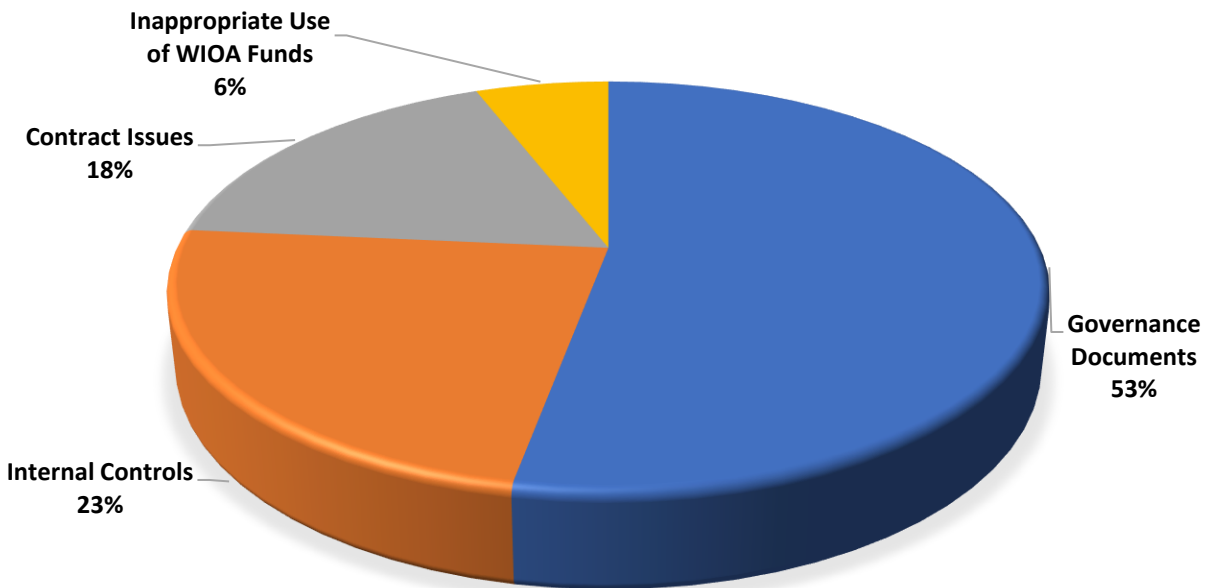
Internal Controls
- In accordance with the Uniform Guidance requirements, a key responsibility for grantees of Federal funds is complying with the terms and conditions of the grant award by meeting identified performance goals, indicators, and milestones. 2 CFR 200.303(a) states: "The non-Federal entity must: (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with…the terms and conditions of the Federal award." It is critical that recipients routinely self-monitor to assess administrative and programmatic expenditures and to adjust as needed.

Contract Issues
- Regions' contracts must contain accurate information, clear expectations of work responsibilities, and timelines for completing required tasks. This will ensure that all parties understand their respective roles and avoid confusion.

Inappropriate Use of WIOA Funds
- WIOA funded individual training accounts (ITAs) cannot be used to provide training not listed on the state's Eligible Training Provider List (ETPL). TEGL 19-16 describes how WIOA funds can be used to provide training either through an ITA or, for non-ETPL training, the exceptions for providing the training through a contract.

PY2022 Fiscal &Admin-Related Areas of Concern/Findings – Governance Documents
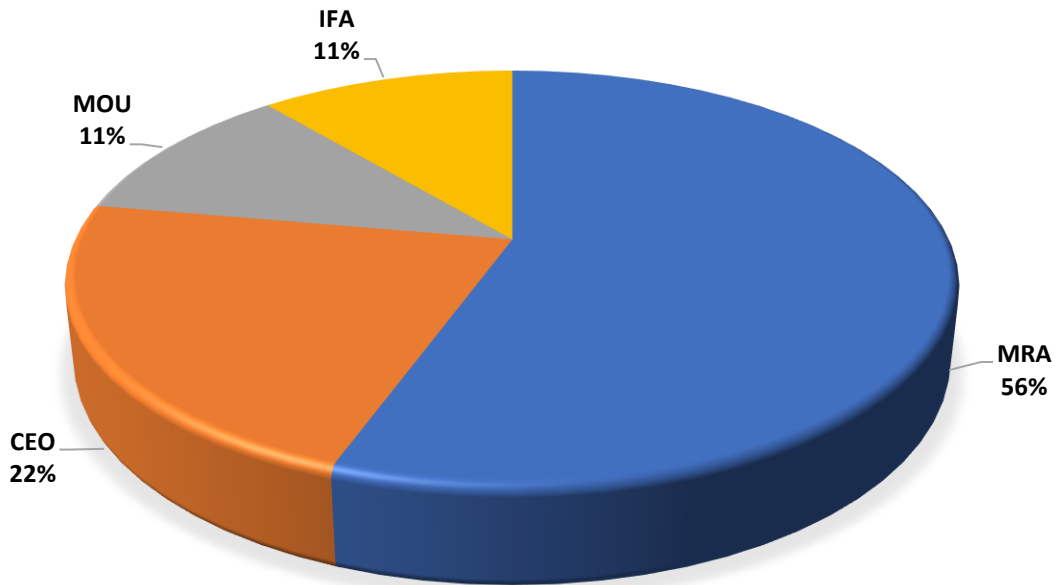
Multiple Role Agreements (MRA)

- Organizations that fulfill more than one role – e.g., staff to the board, one-stop operator (OSO), service provider, fiscal agent – must have a written agreement in place with the Local Workforce Development Boards (LWDBs) and Regional CEO to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and related regulations. WIOA sec. 121(d)(4)(A), 20 CFR 679.430, TEGL No. 15-16 and DWD Policy 2022-05 all provide guidance pertaining to entities serving multiple roles, delineation of duties, reporting structures, firewalls, and conflict of interest.

Chief Elected Officials (CEO) Agreements

- WIOA sec. 107(c)(1)(B) allows areas that have more than one unit of local government to execute an agreement among the CEOs of those units that specifies the roles of the individual CEOs in carrying out their responsibilities identified in the law, including the appointment of LWDB members.
- At a minimum, the agreement must identify the method to be used to determine financial liability amongst the individual jurisdictions pursuant to 20 CFR 683.710. DWD further requires the CEOs to identify one CEO to serve as the RCEO.

Memorandums of Understanding (MOU) and Infrastructure Agreements (IFA)

- According to WIOA Sec 121(c), the LWDB, with the agreement of the Regional Chief Elected Official (RCEO), must develop an MOU between the LWDB and its one-stop partners that describes how programs and activities will be provided in the one-stop delivery system, including how the infrastructure and other shared costs will be jointly funded. The contents of fully executed MOUs are outlined in 20 CFR 678.500(d).
- DWD Policy 2018-04, Change 1, Memoranda of Understanding and Infrastructure/Additional Costs Funding Guidance requires that each operating budget and funding agreement be reviewed and reconciled twice per year against actual costs incurred. This ensures that costs charged to any of the one-stop partners are proportionate to their use of the local one-stop center relative to the benefit received.

PY2022 Program-Related Areas of Concern/Findings
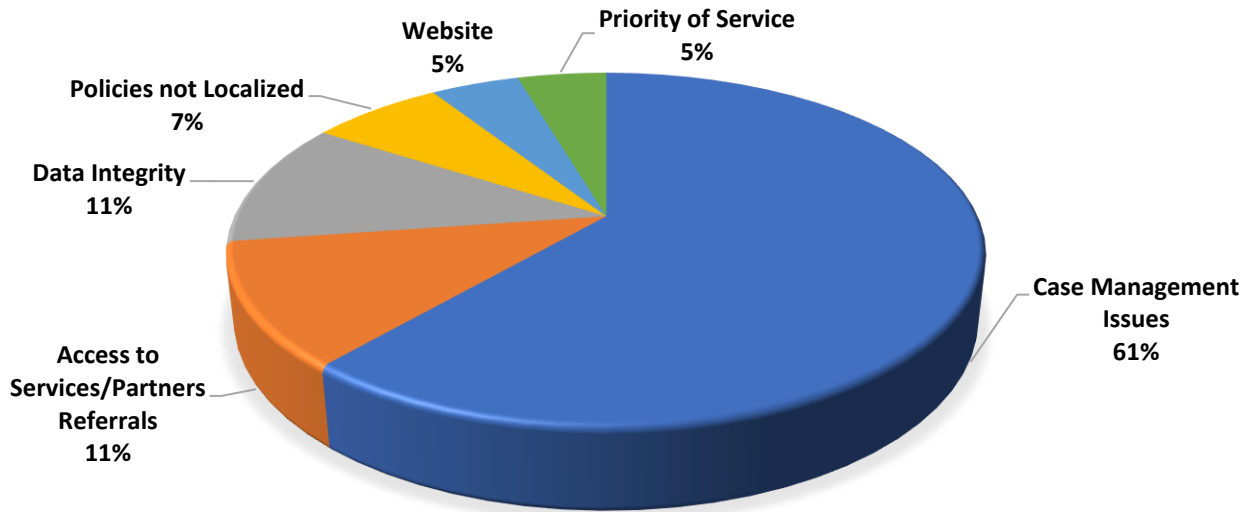
Case Management
- Issues include Eligibility/Assessment, Failure to Identify and/or Address Barriers, File Management, and Exit/Follow-Up Procedures.
- Poor case management could result in inadequate service delivery, poor performance, funding reductions, and lost opportunities related to additional funding.

Access to Services/Partner Referral
- Comprehensive WorkOne offices must make all partner services available. Offices can have partners onsite, staff trained on partner programs, or by using a robust referral procedure. (TEGL 16-16)
- Regions lacking a uniform referral process could result in clients receiving inconsistent services across offices.

Data Integrity
- Contradictory information between the WIOA application, case notes, and supporting documents reduces the integrity of the data and could result in individuals not receiving needed services.
- To minimize data validation failures, care should be taken to ensure that all client data is accurate and consistent throughout each client's Indiana Career Connect (ICC) records.

Policies not Localized
- Department of Labor (DOL) and DWD guidance often requires regions to develop their own local policies.
- Regions' localized policies should provide detailed instructions for implementing the new guidance within the region's own unique service delivery model.

Priority of Service (POS)
- WIOA section 134(c)(3)(E) prescribes how LWDAs must allocate WIOA Adult funds for individuals to receive individualized career and training services. WIOA designates specific populations as priority due to being the "most in-need". WIOA also gives regions the option to add locally defined POS populations.
- This designation allows populations to be served first, however the POS designation must be determined accurately during the enrollment process for the individual to be served accordingly.

Website
- The public depends on regions' websites to learn about the availability of WorkOne services and to obtain WorkOne office contact information.
- To avoid confusion and frustration for individuals seeking assistance regions should be conscientious about ensuring all offices' locations, phone numbers, and office hours are current.

PY2022 Case Management-Related Areas of Concern/Findings
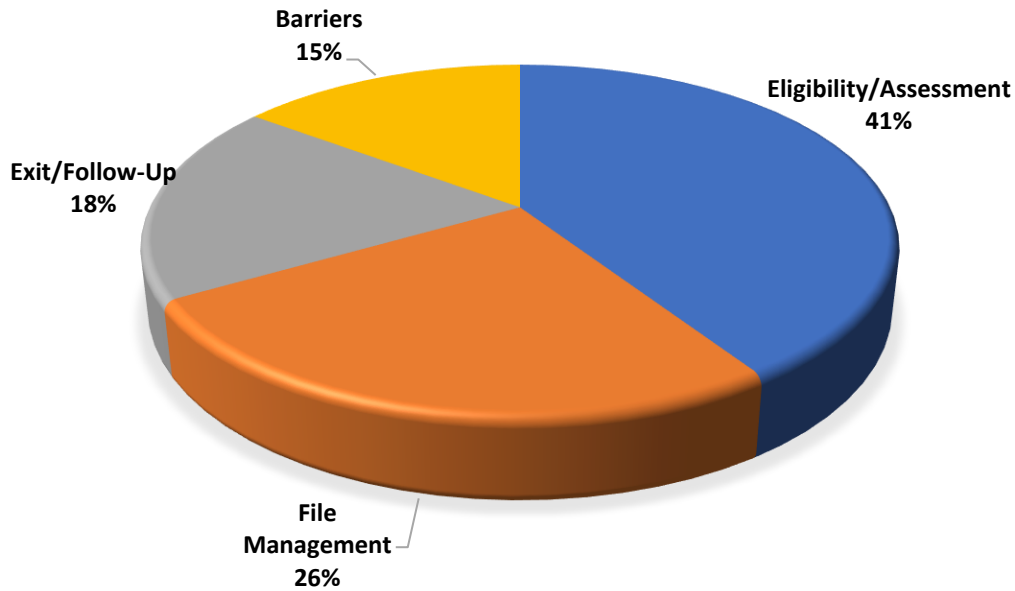
Eligibility/Assessment

- Information contained within the individual's ICC file should always provide clear justification for the provision of services provided (TEGL 19-16). It should detail the individual's need for assistance as well as their willingness to participate.
- Incorrect use of Self-Attestation forms for required eligibility documents could lead to questioned expenditures and potential disallowed costs.
- Failure to enroll clients into all programs for which they are eligible may result in clients having access to a smaller array of services than would otherwise be available. Co-enrollment into multiple programs provides additional avenues of support and opportunity for the individual to achieve their goals.
- Inconsistent assessment processes or tools could produce inaccurate eligibility determinations, and services being delivered that are not tailored to the individual's specific needs. It is critical that case managers use a consistent assessment process and tools to identify individuals' specific barriers and to develop service plans that provide individuals the best chances to be successful.

File Management

- Unsecured Personal Identifiable Information (PII) puts clients at risk for having their personal information being used for unintended purposes. Consistent with 29 CFR 38.41 and DWD Policy 2022-08, regions should strongly consider scanning all documents containing individuals' PII into ICC and either returning the documents to the individual, placing them in a locked cabinet/drawer/shredder container, or shredding them immediately. If paper documents are retained, they must be kept in either locked cabinets or drawers. PII must always be secured.
- For consistent case management services as well as for monitoring purposes, it behooves regions to scan all required documents used to establish eligibility for WIOA enrollment into ICC. Documents should also be properly labeled and stored in the correct section of ICC. Consistent storage of documents in ICC makes it easier for others to access as needed.
- Sparse, unclear, and incomplete case notes are like puzzles with missing pieces. Quality case notes provide the individual's story and explain their journey accessing workforce services. Case notes should be clear, concise, individualized, and complete. They serve to justify the services provided, track successes and setbacks along the way, and document how the case manager served (or attempted to serve) the client.
- The Individual Employment Plan (IEP) is a collaborative, living document created with the individual. It should contain specific goals and detailed steps on how to achieve those goals. It can also be adjusted/updated according to changes in the individual's circumstances/needs. The IEP is a tool, a roadmap of sorts, for both the case manager and the individual.

Exit/Follow-Up

- DOL's 2023 WIOA Adult Review highlighted the need to ensure that processes are in place for documenting attempts to follow-up with clients after exiting them from services.
- In ICC a manual exit date must be accompanied by a service and a case note. The goal of all individuals participating in a WIOA program is employment. Once this goal has been obtained, individuals should be exited to employment. This process is not complete without case managers providing job retention counseling, reminding the individual that follow-up will occur over the next 12 months, entering the employment and exit information into ICC, and case noting why the individual exited from services.
- ICC will automatically exit individuals after 90 days of no activity/services, which means that the last service date is the actual exit date; therefore, it is extremely important that all follow up services attempted and provided get entered into ICC. Not following required exit procedures decreases regions' ability to meet their WIOA performance metrics.
- Follow-Up services provide individuals with support and guidance that may increase their ability to retain the employment that they worked so hard to obtain. Providing this follow-up also helps regions collect the information they need to meet their employment metrics.

Barriers

- Failure to identify and address individuals' barriers has a domino effect reducing individuals' chances of achieving positive outcomes. Not identifying and addressing barriers results in less productive/more difficult job searches, inaccurate referrals, creation of ineffective training plans, and could potentially place additional obstacles in individuals' paths.

Equal Opportunity (EO) Data Analysis

29 CFR 38.51(b) requires grant recipients to conduct a data analysis and subsequent investigation into significant differences in populations receiving services. The Compliance Team chose to utilize the same analysis as last program year (PY), a standard deviation (SD) formula developed by the National Association of State Workforce Agencies' (NASWA) EO Subcommittee which compares WIOA recipient demographics with US Census data on gender, race, ethnicity, age, disability status, and limited English proficiency (LEP). This year the analysis was done comparing PY2021 Indiana Career Connect (ICC) data for WIOA enrollments to both population labor force and unemployment data. The goal of the analysis was to identify if Indiana's regions are serving protected groups at the level expected given the demographics of the population within each area. We would expect the numbers of individuals served in an area to be representative of individuals in the community. SD is used to measure how likely an outcome is due to random chance. We can assume that a SD within -2.0 and +2.0 is due to random chance and a SD outside that range is due to outside factor(s) influence.

If a category's SD is greater than +2.0, it suggests services were provided significantly less to people in that protected group and therefore indicates that there is a higher probability of possible discrimination. The below tables show Indiana's data analysis results as an entire state. Statewide we can see that protected groups with higher SDs include individuals 55+ years old, people of Asian descent, and people of "Other" race.

The Compliance Team's analysis of each region was included in each region's WIOA monitoring reports. Below is an analysis for the State of Indiana for comparison purposes.

EO Data Analysis for Indiana				
PY2021 Labor Force Data		Category	**PY2021 Unemployment Data**	
Deviation	Probability of Potential Discrimination		Deviation	Probability of Potential Discrimination
-53.22	No	Black/African American	-16.59	No
3.62	**Yes**	**Other**	**5.73**	**Yes**
4.86	**Yes**	**Asian**	**4.69**	**Yes**
-5.21	No	**Ethnicity**	-0.66	No
18.24	**Yes**	**Age**	**15.04**	**Yes**
-24.65	No	**Disability**	0.62	No
-7.04	No	**Gender**	-4.66	No
0.76	No	**LEP***	0.76	No

*Census data does not break down this population into labor force and unemployment, so this is entire population 18+

PY2022 EO-Related Areas of Concern/Findings
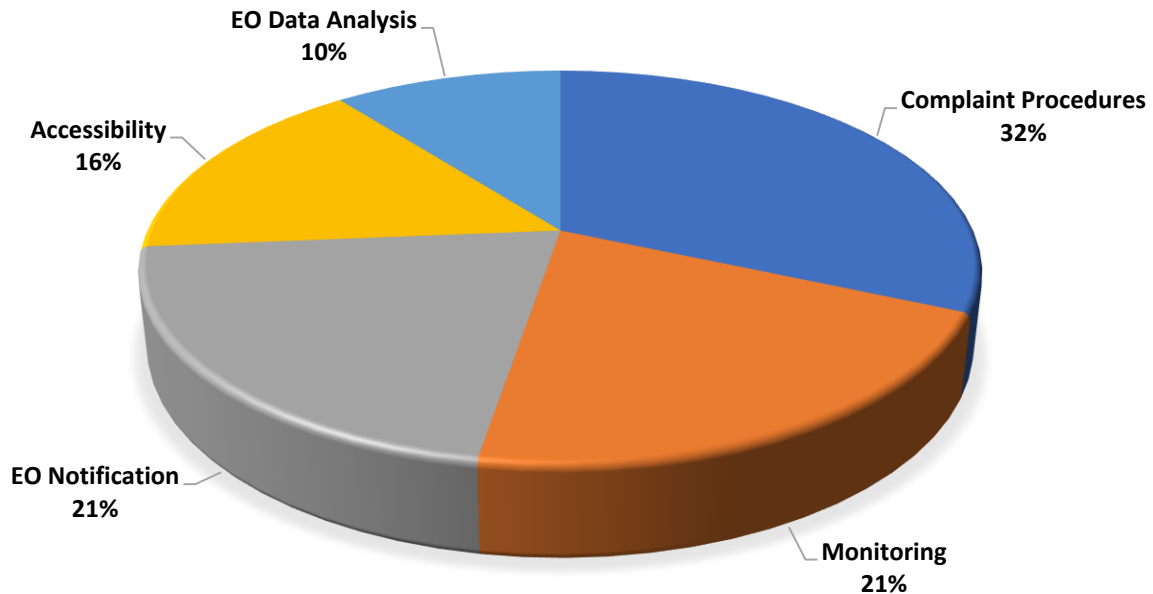
Complaint Procedures
- Regions must develop and publish their own region-specific procedures for processing discrimination complaints. These procedures must include the required elements under 29 CFR 38.72. Regions must ensure these procedures are followed and make them available to the public. In January 2022, DWD published Technical Assistance 2021-07 to assist regions in developing complete complaint processing procedures that would best serve individuals who choose to file a complaint on the basis of a protected class as defined in 29 CFR 38.

EO Monitoring Issues
- Local EO Officers must monitor and investigate their subrecipient service providers that receive WIOA Title I-financial assistance to ensure they are not violating their nondiscrimination and equal opportunity obligations (20 CFR 38.31). Monitoring is an assessment to determine whether the region's subrecipient(s) have fulfilled their obligations under Section 188 of WIOA and must take place at least annually. Results of monitoring should be communicated to subrecipients and any issues identified should have a resolution process.

EO Notification Issues
- Regions must communicate to registrants, participants, employees and applicants, professional organizations with agreements with the region, subrecipients, and the public its participation in WIOA Title-I activities and that it does not discriminate (20 CFR 38.36). This is done through a variety of ways, including the EO Notice being posted in prominent places within WorkOne offices, disseminated to participants and employees, and being included in group presentations. The required EO assurance language must also be included in contracts, Memorandums of Understanding, and On-the-Job Training contracts, work-experience, and other agreements. The EO tagline must be included on all marketing material, including written materials and broadcasts.

PY2022 Noteworthy Efforts – Accessibility
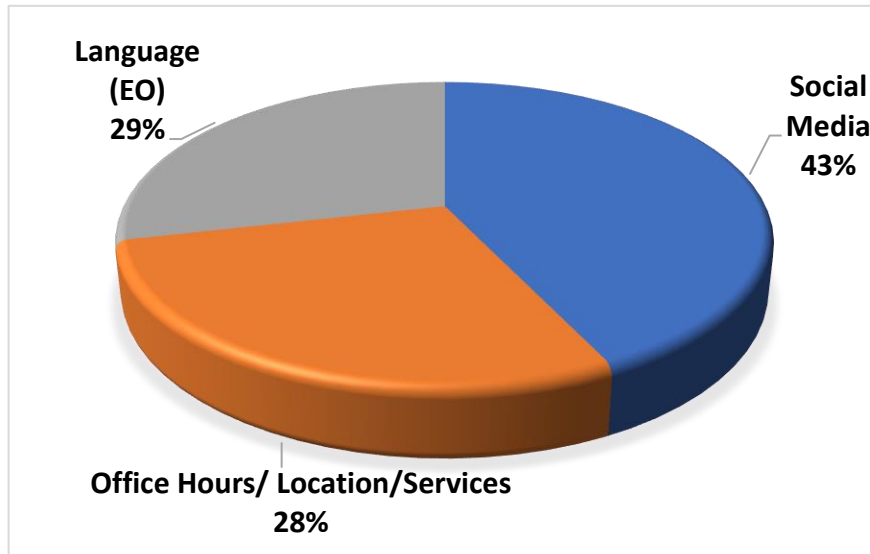
Social Media/Communication
- Several regions utilized a variety of social media outlets such as LinkedIn, Facebook, Twitter (now known as X), and Instagram to reach out to their local communities with helpful information about WorkOne services, job opportunities, and community resources. Some regions also created informative, motivational, and amusing TikTok videos to reach a diverse group of people who may need assistance from WorkOne or other community partners.

Personalized Facebook Pages to Promote WorkOne Services
- One region had two Career Services Advisors create their own Facebook pages that feature a mix of job postings, career fairs, and job search tips, along with some inspirational and humorous posts. The goal of these pages is to increase awareness of what WorkOne offers in an informal, friendly way and to make events and services more welcoming.

LWDA Websites Promote Transparency
- Regions provided increased transparency into their WorkOne systems' performance by developing quarterly reports that are presented at board meetings and then posted on their website. In addition to including area performance statistics, regions have incorporated details on unemployment rates, WARN Notice/Rapid Response activities, hiring events, the status of various grants, and JAG highlights.

Language and Disability Access Services
- One Region provided interpreter services in 10 different languages during a Rapid Response Orientation for WorkOne services. Additionally, staff were knowledgeable on how to access interpreter services and were well-informed about Microsoft accessibility tools and other tools available for customers with disabilities.

Extended WorkOne Office Hours, Increased Service Accessibility
- Some regions extended WorkOne office hours to accommodate those whose schedules do not align with standard office hours. One region has a WorkOne office open until 6pm one day a week, two Saturday mornings a month, and virtual services available on select days from 11am until 7pm. These changes follow DOL's encouragement, per TEGL 16-16, to provide clients with more access to workforce services.

Increased Service Options for Clients
- Some regions have invested in pods that look like telephone booths but are equipped with computers / internet access and the ability to virtually connect with a Career Counselor in private. Pods give the public an alternative to coming into the office for assistance with job search, career exploration, and other valuable resources.

PY2022 Noteworthy Efforts - Outreach
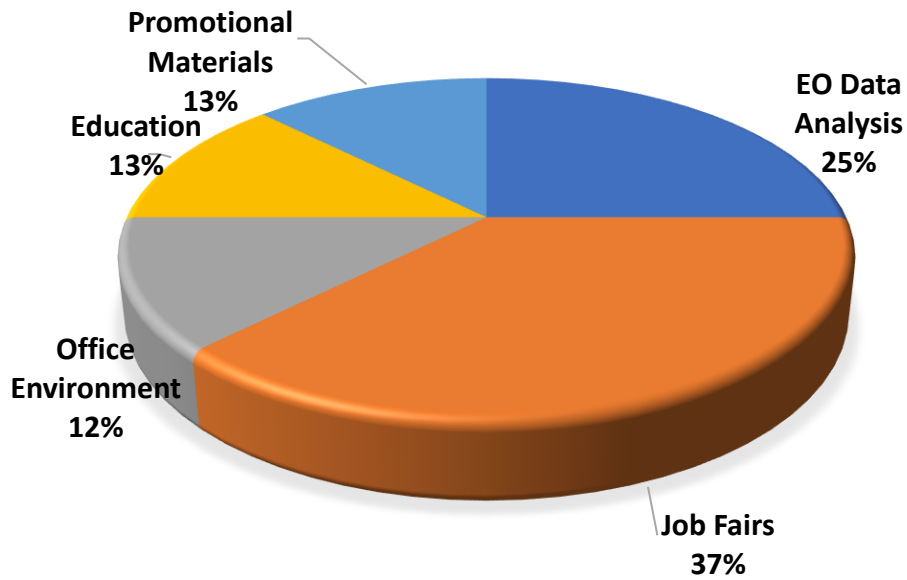
Targeted Job Fairs
- Some regions developed targeted job fairs for populations that may be overlooked in more generalized events including people seeking part-time employment or individuals whose primary language is Spanish. Developing these opportunities illustrates the Regions' commitment to the diverse populations in their communities.

Jobapalooza
- This holistic event was designed to have maximum impact by including agency/community resources (as part of the job fair) to help clients with potential issues, or barriers, that may be impacting their ability to secure employment.

Wednesdays at WorkOne
- One Region holds job fairs almost every Wednesday. Clients are aware of the regularity of the event and realize going to *WorkOne on Wednesdays* guarantees an opportunity to talk with companies that are ready to hire on the spot.

Employment Opportunity for Individuals involved in the Justice System
- One Region collaborated with an entity focused on providing on-the-job training to incarcerated women. The entity has a call center within a correctional facility and works closely with the region to assist inmates gain the skills to successfully transition back into society. Regional staff include an Offender Workforce Development Specialist and a certified Alcohol and Drug Addiction Counselor to further support these individuals.

EO Data Analysis Used to Drive Outreach Efforts
- Two Regions shared their EO data analysis with leadership and others to promote discussions on how to increase services and outreach to underserved populations. As a result, new places/groups were targeted for the regions to connect with.

WorkOne Promotional Tools
- One Region created bracelets, wristbands, and bookmarks with the WorkOne logo / QR code to increase awareness of WorkOne services and to make connecting with these services faster and more efficient.

For information on any of these Noteworthy Efforts, please contact the Compliance Team at oversight@dwd.IN.gov and we will connect you with the appropriate region.

Reemployment Services and Eligibility Assessment (RESEA)

RESEA provides an opportunity to engage Unemployment Insurance claimants and acquaint them with services available through the WorkOne offices to support timely reemployment. PY2022 RESEA monitoring reviewed how regions implemented the RESEA Program, how services were delivered, and data entered into Indiana Career Connect (ICC). Random participant files were selected within an established timeframe based on the RESEA program year, correlated with the beginning of the Regions' monitoring start date. 60 participant files from all 12 regions were reviewed during PY2022. ICC was utilized to review claimant files, weekly pool counts, event calendars, service codes, and case notes. The RESEA Team met with regions' leadership and RESEA staff members in on-site /Teams office visits. During these visits, the RESEA Team attended the Initial Orientation/1:1 Interviews, 10-week Follow-Up, and Sub RESEA events to observe how the local RESEA staff adhere to programmatic requirements and deliver required services. The outcomes below are based off a combination of participant files, on-site/Teams visits, and information gathered from ICC.
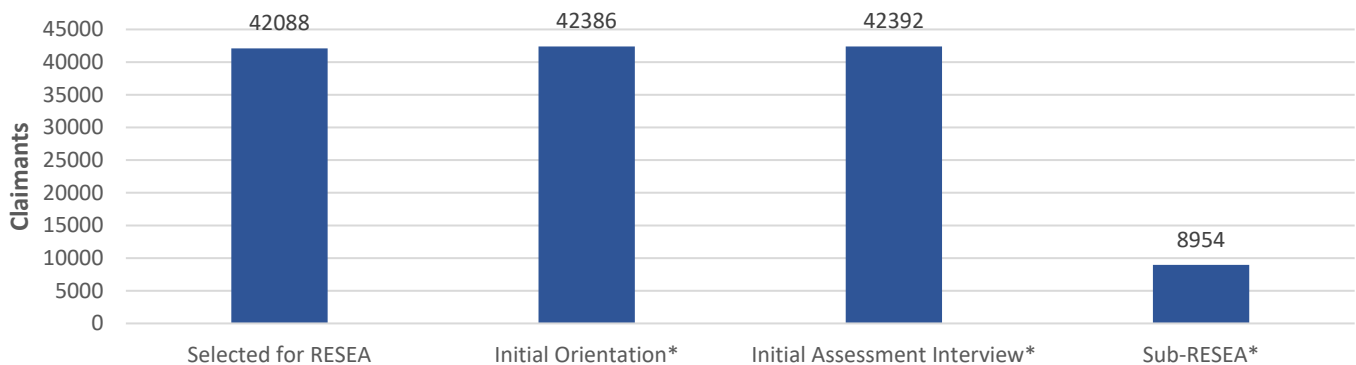
Best Practices:

- Increased minimum number of weekly search activities for RESEA participants.
- RESEA initial orientations and workshops provided in a variety of formats - in person, virtually, individually, group settings.
- RESEA Coaches using the new Individual Reemployment Plan (IRP) Form to drive conversations with individuals and to support them identifying their own barriers and potential activities/assignments to help meet their employment goals.
- Improved management of pool count. All RESEA claimants should be scheduled every week.
- Co-enrolling RESEA claimants in WIOA to provide additional services for barriers identified on IRP can help people meet their employment goals. RESEA provides an additional pool of participants for WIOA.

Areas Needing Attention:

- Late documentation of RESEA events in claimants' ICC case notes and no explanation for late entries provided.
- RESEA Coaches are not developing IRPs with claimants and sections are partially prefilled or incomplete, and missing signatures.
- Some RESEA claimants' ICC records are missing IRPs.
- Assignment of mandatory RESEA workshops is not justified in case notes or based on documented claimant need.

PY2022 Statewide RESEA Claimants

Bar chart titled "PY2022 Statewide RESEA Claimants." Y-axis labeled "Claimants" ranging 0 to 45000. X-axis labeled "Events * includes rescheduled appointments." Values: Selected for RESEA = 42088; Initial Orientation* = 42386; Initial Assessment Interview* = 42392; Sub-RESEA* = 8954.

Apprenticeship State Expansion Grant

In PY2021, PCG Consulting monitored the Apprenticeship State Expansion (ASE) grant and identified areas that Local Workforce Development Areas (LWDAs), as the sub-recipients executing the award on behalf of DWD's Office of Work-Based Learning and Apprenticeship (OWBLA), needed to strengthen. Following the monitoring in PY2022, OWBLA conducted an informal review process with each of the LWDAs to identify technical assistance needs related to implementing ASE grant funded activities. In addition to informal reviews, fiscal reviews were also conducted by the DWD Compliance Team. Throughout the ASE Grant, OWBLA gained valuable insight into LWDAs' positive practices and challenges for fulling their intermediary roles.

Best Practices:

- When speaking with employers about workforce solutions, LWDAs promoted Registered Apprenticeships as the premier workforce solution for attracting and retaining employees.
- Some LWDAs established partnerships with local Adult Education providers to create pathways for apprenticeships, utilizing pre-apprenticeship programs. Pre-apprenticeships through high school, adult education or other independent training providers were promoted to develop a diverse talent pipeline.
- LWDAs became sponsors of Registered Apprenticeship Programs (RAPs), collecting and submitting data in DOL's Registered Apprenticeship Partners Information Database System (RAPIDs) for their employer partners.
- LWDAs utilized ASE funding to expand RAPs with employers that were already using the model. By supplementing the cost of training, more apprentices were able to participate.
- Through blending ASE and WIOA funding, LWDAs were able to increase the available funding for employers and apprentices and provide more services.
- All LWDAs, as designated DOL Intermediaries, established at least one central contact and subject matter expert.

Areas Needing Attention:

- LWDAs shared with OWBLA that they identified employers lacking knowledge and understanding of how Registered Apprenticeships work and needed to explain the benefits of using Registered Apprenticeships to build and sustain a quality workforce. It is important for LWDAs to communicate the breadth of apprenticeships across industries and occupations, as well as the return-on-investment for employers.
- LWDAs had varied levels of understanding for how to create apprenticeships. As intermediaries, LWDAs are required to work with employers to identify their needs and to ensure that a Registered Apprenticeship Program is created to meet those needs. This can be a long and extensive process, especially as some LWDAs encountered employers that needed more in-depth assistance for activities such as updating job descriptions and required skills.

OWBLA Resources:

To address the barriers and challenges the LWDAs encountered as intermediaries on the ASE grant, OBWLA has developed the following processes and initiatives to improve outcomes on this and future apprenticeship grants:

- OWBLA established the Resources SharePoint, which houses resources for promoting apprenticeships including online marketing templates, trainings, updated policy and forms and other essential resources in a timely manner: DWD OWBLAs Resource Site - RESEARCH & DESIGN (sharepoint.com)

- Twice a month, OWBLA hosts office hours for statewide apprenticeship partners, including LWDAs, to provide technical assistance, share best practices and facilitate discussion around grants, apprenticeship, and outreach opportunities. Please contact wbl@dwd.in.gov if you'd like to participate.

- OWBLA created DWD Technical Assistance 2022-10, Change 1 Indiana Career Connect Data Entry for DOL Apprenticeship Grants to assist LWDAs to track client apprenticeship information accurately in ICC. OWBLA provided training and technical assistance on this guidance. Links to training and materials are available on the DWD OWBLA Resource Site referenced above.

- The Indiana Eligible Training Provider List (ETPL) application process has been streamlined making it more efficient for employers to register their RAPs. More details are available in the DWD Technical Assistance 2020-17, Change 1 WIOA INTraining and ETPL Procedural Guidance.

- A portal was developed for intermediaries and employers to submit information for pre-apprenticeship certification and, once certified, the portal will serve as a data collection site for pre-apprenticeship.

- Effective for PY2023, OWBLA is monitoring LWDAs' implementation of the Apprenticeship Building America (ABA) Grant. This process includes conducting one-on-one interviews, reviewing materials LWDAs submit in advance of the monitoring visit, and developing a report of review outcomes. The list of LWDAs' ABA documents needed for monitoring has been incorporated into the Compliance Team's Pre-Monitoring Doc Request spreadsheet on the ABA tab. Incorporating monitoring into its oversight activities enables OWBLA to provide more targeted technical assistance to support LWDAs as needed.

Policy Overview

DWD's Policy Team develops guidance to ensure workforce programs:

- Are implemented and administered in alignment with state and federal guidelines;
- Meet the business needs of Indiana's employers; and
- Connect individuals to appropriate workforce development services.

Throughout PY2022, DWD's Policy Team issued 32 guidance documents consisting primarily of agency policy updates and programmatic technical assistance. Agency policy is formalized, high-level, conceptual guidance that outlines roles, responsibilities, objectives, and a vision for Indiana's workforce system. Generally, technical assistance expands on agency policy to provide additional guidance on program implementation and supports improved participant outcomes, accurate data entry, program compliance, monitoring, and/or performance.
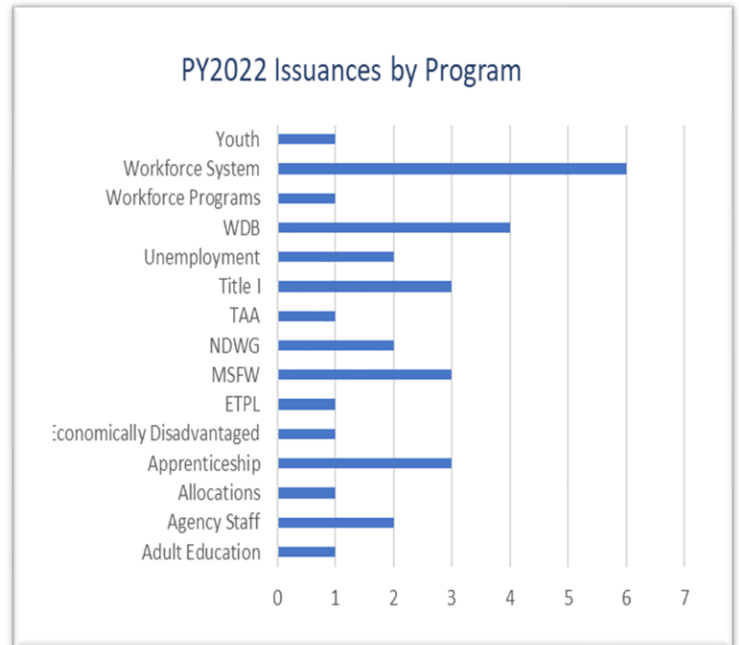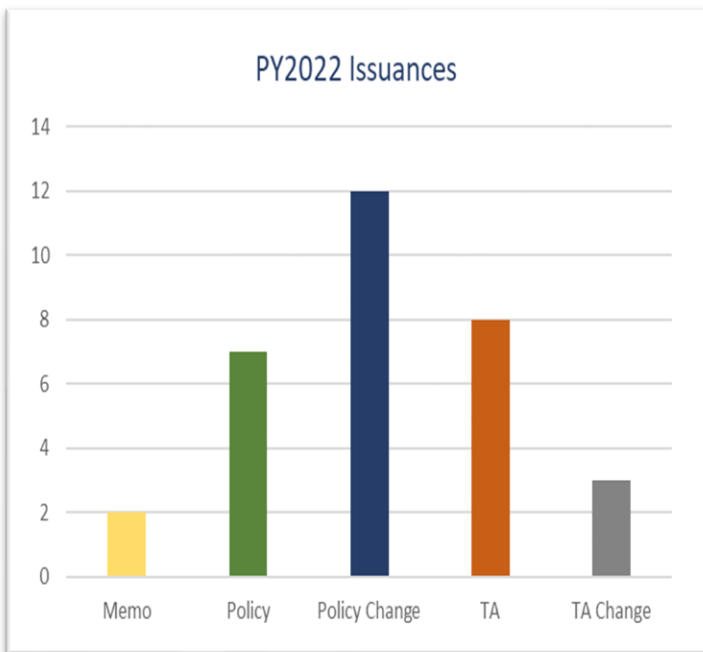
PY2023 Monitoring

The Compliance Team has made some changes to the PY2023 review process. These include:

- Office visits will be less structured than in the past, as monitors strive to observe staff's work with participants in real-time. Monitors will continue to approach case managers, welcome desk staff and participants to gain a better understanding of how services are delivered. The schedule of offices to be visited each day during review week will be shared during the entrance conference. Virtual Microsoft Teams calls with case managers may also be requested (particularly for staff in affiliate offices), so regions will need to be prepared with the appropriate technology.

- Fiscal monitors will have a greater focus on the regions' accounting systems, financial reporting, and budgets. Financial and program data will be analyzed to assess whether the grant recipient is on target with spending and meeting performance goals. Monitors will also be validating that LWDAs' financial management system or budget control mechanism is monitoring spending.

- Program monitors will have a deeper focus on client engagement and service quality – including identification of barriers and use of effective, individualized service strategies. Staff in the WorkOne offices can also expect more questions and "what-if" scenarios focusing on these essential topics during monitoring visits.

- EO monitors will have a deeper focus on analyzing language access, complaint processing, and website accessibility.

- The Workforce Programs and Services Team will be conducting a concurrent review of regions' implementation of the Workforce Ready Grant. Other workforce programs and grants that will be reviewed concurrently with WIOA may include RESEA, MSFW, NLJ-ETG, ABA, and QUEST DWG (where applicable).

PY2023 Monitoring Schedule	Region
August 14, 2023	11
September 11, 2023	10
October 2, 2023	1
October 30, 2023	4
December 4, 2023	8
January 8, 2024	12
January 29, 2024	5
February 26, 2024	9
April 1, 2024	7
April 29, 2024	3
May 20, 2024	2
June 10, 2024	6

Please visit the Compliance & Policy webpage to help prepare for monitoring:

DWD: Monitoring Resources

Includes links to Pre-Monitoring Document Request, Internal Controls Matrix, MSFW Self-Monitoring Tool, RESEA Staffing Report and DWD Monitoring Tools.

Thank You!

Thank you for all the hard work and effort you put into preparing for DWD compliance reviews. We understand that it is difficult to prepare and participate in our reviews while maintaining a normal business flow in the office. We appreciate you and the service you provide to the members of your communities.

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