

Monitoring Year-in-Review

Program Year 2025 (PY25)

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Welcome!

Welcome to the fifth edition of the Indiana Department of Workforce Development (DWD) Monitoring Year-in-Review (YIR). This edition presents aggregated outcomes and analysis from DWD's Program Year (PY) 2025 compliance reviews for the Workforce Innovation & Opportunity Act (WIOA) Title I (Program, Equal Opportunity, Fiscal/Admin), the Employer Training Grant (ETG), and the Apprenticeship Building America (ABA) Grant. It also includes feedback from DWD's internal reviews on the Jobs for Veterans State Grants (JVSG) program pertaining to Local Workforce Development Areas' (LWDAs) staff responsible for navigating veterans coming into American Job Center/(WorkOne) offices.

DWD encourages LWDAs to use the YIR to compare local monitoring results with statewide trends. Reviewing aggregated data gives LWDAs valuable context for understanding how their practices align with those of peer regions. It also helps local leaders benchmark performance, identify recurring or emerging risks, recognize successful strategies, and proactively address potential areas of concern. Because local compliance directly contributes to overall statewide compliance, understanding statewide patterns also helps each LWDA see how its practices strengthen Indiana's workforce system as a whole.

The PY25 compliance review results highlight several notable statewide trends:

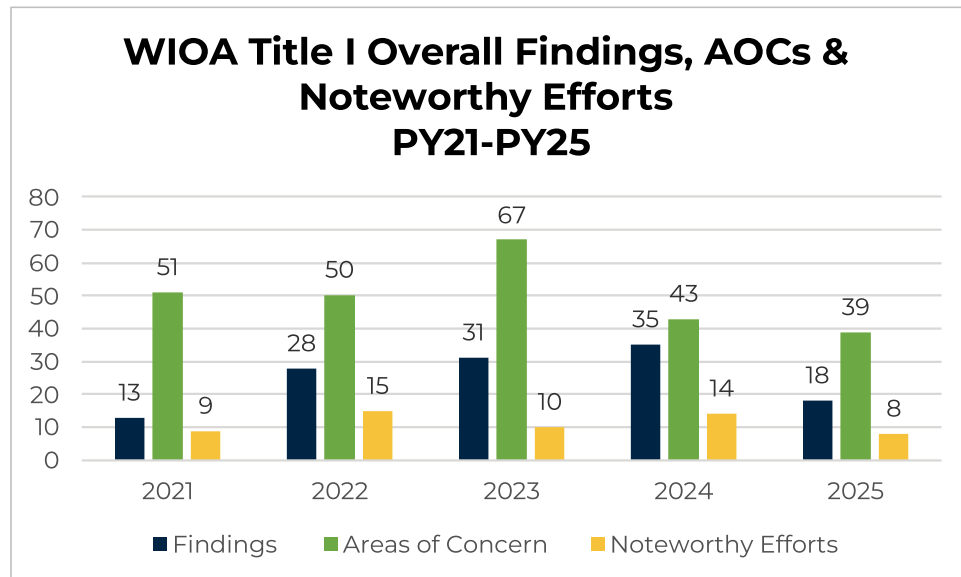
- Case management and data integrity accounted for nearly half of all findings, signaling continued challenges related to documentation quality, timely and accurate data entry, and consistent assessment practices.
- Equal Opportunity compliance was another key theme, with outcomes involving notification, monitoring, documentation, accessibility, and training—indicating that implementation of EO requirements varies across Regions.
- Subrecipient monitoring issues point to opportunities for stronger oversight and more consistent monitoring tools and processes, while governance and contract-related findings were fewer and appear to be localized rather than systemic.
- Strong practices across LWDAs, including thoughtful internal processes, innovative approaches, and continuous improvement efforts. These practices strengthened service delivery, supported staff, and improved participant outcomes.

Collectively, PY25 results reinforce the importance of clear procedures, consistent implementation, and ongoing staff training, while also demonstrating meaningful progress and a continued commitment to excellent statewide service delivery.

This YIR includes an overview of how Program Administration supports Regions in closing gaps, refining processes, and strengthening service delivery. Regions that invest time in proactively addressing potential issues—before they appear in monitoring—reduce the likelihood of repeat findings, improve both local and statewide data validation results, and position themselves to achieve stronger performance outcomes.

The dedication shown across Indiana's workforce regions reflects a strong foundation for ongoing advancement. As LWDAs continue to refine processes, strengthen staff capacity, and expand positive practices, the statewide system grows stronger and more aligned. DWD appreciates the partnership and efforts of every Region and remains committed to supporting your continued success in PY26 and beyond.

WIOA Title I – Monitoring Outcomes

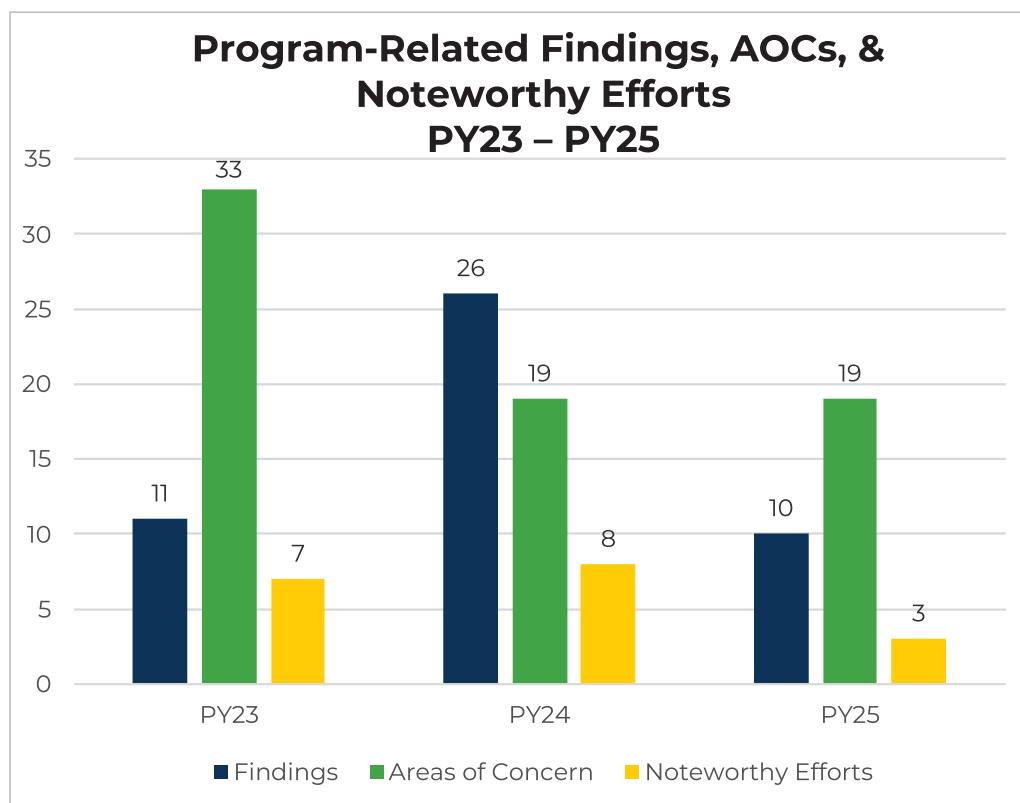


Overall Observations

- Compliance review reports are written based on Findings, Areas of Concern, and Noteworthy Efforts which are defined as follows:
 - Findings:** Items identified as non-compliant with federal, state, or local regulations, policies, or procedures shall be classified as Findings. Specific areas of non-compliance are described, and citations of applicable authorities are provided. Detailed, required corrective actions are provided 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. Suggestions/ recommendations for improvement may be provided.
 - Noteworthy Efforts:** New, unique, significant, or innovative initiatives and results, and/or notable or exemplary practices
 - Keep in mind that the numbers of Findings/AOCs vary significantly across regions. For example, three regions had no Findings in their PY25 reviews whereas two regions had as many as four.
- A particularly important trend in the numbers of Findings/AOCs is the high proportion of repeat issues. In PY25, repeat and non-repeat Findings/AOCs were nearly evenly split which is an increase from PY24 when 41% of issues had been previously cited. The majority of repeat issues are based on case management practices which will be discussed below in the Program section. The persistence of unresolved issues from one year to the next suggests that Regions may be encountering challenges in developing sustainable, root-cause solutions.
- Monitors occasionally observe that Regions' efforts to address AOCs are not sufficient to fully resolve the issue. In these cases, the issue may be classified as an AOC for an additional year when there is evidence that the Region is actively working toward a solution. In some instances, timing plays a role—for example, a Region may have implemented a new procedure or tool, but the effective date did not align with the period covered by DWD's monitoring sample.

- For participant record reviews, the Compliance Team considers factors such as training dates and the implementation timeline of new tools or protocols when evaluating overall results. DWD aims to acknowledge the progress Regions are making, and in some circumstances, assigning a repeat AOC remains the most appropriate approach.
- Please note that an unresolved problem identified as an AOC in one year's compliance review report may be elevated to a Finding in the next year's report.
- Similarly, sometimes Regions will address issues identified as Findings through implementing the described corrective action measures, but the problem continues to persist and is noted again the following year during monitoring. When this happens, DWD uses its review activities (staff interviews, on-site observation, participant record reviews, etc.) to evaluate the effectiveness of the Region's corrective action measures. Depending on the circumstances, the issue could be classified as a Finding again with new required corrective action, or an AOC if that would be more appropriate.

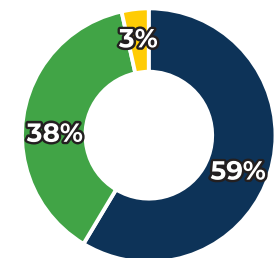
WIOA Title I – Program Outcomes



- Program-related issues are included in the WIOA Title I Service Delivery section of compliance review reports.
- While there were equal numbers of Program-related AOCs identified in PY24 and PY25 reviews, there was a 61% decrease in the number of Program-related Findings and a 35% decrease in the combined number of Findings/AOCs.
- While the total number of Findings/AOCs decreased from PY24 to PY25 the percentages of types of issues identified – case management, data integrity, and grant administration/priority of service – remained the same.

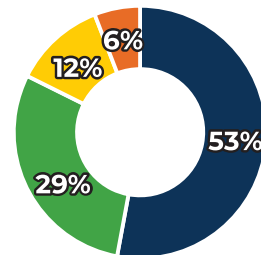
- It is significant that 82% of these outcomes were repeat issues and were identified in 10 of the 12 regions' PY25 compliance review reports. This means that they were cited in the same regions' PY24 compliance review reports as Findings or AOCs and were either not addressed or addressed insufficiently to have sustainable positive results.
- Conversely, improvements were made such that issues appearing in previous years' compliance review reports including grant administration, access to required partner services, and websites lacking information or including inaccurate information were effectively addressed and not identified in PY25 reviews.
- Program-related Findings/AOCs were cited in all but one of the regions' PY25 compliance review reports.

PY25 Program-Related Findings/AOCs



- Case Management
- Data Integrity
- Priority of Service

PY25 Case Management Findings/AOCs



- File Management
- Inadequate Assessment
- Barriers
- Selective Service

Case Management

- 59% of WIOA Program-related Findings and AOCs were related to Case Management issues, which included File Management, Eligibility/Inadequate Assessments, Failure to Address Barriers, and issues related to Selective Service.
- Insufficient case management can lead to substandard service delivery, weaker performance outcomes, potential funding reductions, and missed opportunities for securing additional funding/resources.

File Management

- File Management issues accounted for 53% of all Case Management related Findings/AOCs and all nine Regions that were cited as having File Management issues had these in PY24 as well.
- Effective File Management is a critical part of case management and requires consistent attention to detail. Thorough oversight helps mitigate errors by ensuring that all required client documents are collected and that ICC accurately reflects client services and activities delivered ([DWD Policy 2023-05](#)). Inadequate File Management may adversely affect the quality of client services and may also impact a Region's performance during DWD's data validation review.
- The most common File Management concerns identified during PY25 were:

- **Missing documents.** This included required signed documents (e.g., WIOA applications, ISS/IEPs, etc.), Selective Service registration or proof of exemption, and priority of service documentation. The absence of required documentation could result in questioned program eligibility and associated costs.
- **Medical diagnoses in case notes.** Staff must avoid entering participants' medical diagnoses in ICC case notes to uphold confidentiality and protect sensitive health information that may lead to potential discrimination ([DWD Policy 2023-05](#)).
- **Untimely data entry.** [DWD Policy 2023-05](#) requires that all data, including services and case notes, be entered into ICC within three business days of delivery. Timely data entry ensures that client records remain accurate, complete, and reliable, and staff can make informed decisions based on current data, reducing the likelihood of errors or inconsistencies.
- **Lack of staff contact and services.** Routine contact is essential to ensuring participants receive the support they need to reach their employment goals. Regional policies may define how often case managers should engage with participants, and these guidelines should prioritize meaningful participant support while remaining mindful of case manager capacity.

Inadequate Assessments

- PY25 monitoring identified that 29% of Case Management outcomes were due to Inadequate Assessments. 80% of Regions cited for having Inadequate Assessments also had this issue identified in their PY24 monitoring
- Five regions' compliance review reports indicated that sampled participant records lacked a thorough assessment of education, work history, and living circumstances. Thorough reviews of these foundational factors are essential for identifying patterns that may affect employability. When these assessments are insufficient, key barriers may go unrecognized, leading to ineffective service planning, missed opportunities for intervention, and reduced overall program effectiveness.
- Monitoring identified sample participant records that contained an incomplete objective assessment summary (OAS). Completing the OAS in full, including all questions and clear summaries of the participant's current circumstances and identified barriers, is critical for ensuring accurate assessments and effective service planning.
- Although Inadequate Assessment practices continue to be identified during monitoring, the number of regions with these Findings/AOCs decreased from eight in PY23 and PY24 to five in PY25.

Failure to Address Barriers

- 12% of PY25 Case Management review outcomes were attributed to two Regions' sampled participant records Failing to Address Barriers to employment with appropriate service strategies. Inadequate identification and planning around these barriers reduces the likelihood that participants will achieve their education and employment goals and sustain long-term career success.
- Recognizing employment barriers and developing individualized service plans with targeted interventions greatly increases participants' chances of achieving positive outcomes and represents one of the most critical functions of case management.
- Case managers demonstrate their efforts to help participants overcome barriers by consistently documenting both successful and unsuccessful attempts to maintain regular contact, as well as all referrals made to partner agencies and community resources.

WIOA Eligibility: Selective Service

- One region was identified to have a case in which a participant record contained insufficient documentation of Selective Service registration status.
- Complete and accurate verification of Selective Service registration is a critical component of determining WIOA eligibility. When an individual is required to register but has not done so, the record must include adequate documentation demonstrating that the failure to register was not knowing and willful ([TEGL 11-11, Change 2](#); [DWD Policy 2021-03](#)).

Data Integrity

- 38% of Program-related review outcomes cited in PY25 were due to 11 Regions' sampled participant records having Data Integrity issues, which include insufficient, inconsistent, or incorrect information in different elements of clients' ICC records and inaccurate reporting of measurable skill gains (MSG) and credentials. It should be noted that 100% of Regions cited for having Data Integrity issues were cited for the same issue in PY24. Several of these Regions were also cited for Data Integrity issues in PY23.
- Discrepancies among the WIOA application, case notes, and supporting documentation may prevent participants from receiving the services they need.
- Case notes entered in ICC not only document a participant's progress but also substantiate the services delivered ([DWD Policy 2023-05](#)). A frequent issue identified by monitors is case notes for counseling or coaching activities that fail to specify the type of guidance provided. Many of these entries appear to focus on collecting information from the participant rather than the details describing the actual service delivered. When activities are recorded in ICC without sufficient detail to verify the services provided, it can negatively affect the accuracy and integrity of a region's data.
- Correctly recorded measurable skill gains (MSGs) and credentials strengthen program accountability, ensure compliance with federal reporting requirements, and contribute to a more accurate representation of regional and statewide performance. While there remains a concern with the accurate reporting of MSGs and credentials, there was a significant reduction between PY24 and PY25 in the overall number of sampled participant files containing MSG and credential-related issues.

Priority of Service

- One region was identified as serving a low number of Priority of Service populations. This could limit a region's ability to effectively support individuals who are most in need and may also affect performance outcomes.

Suggestions for Improvement

PY25 monitoring review outcomes and high percentages of repeat issues indicate continued challenges in case management practices, documentation practices, and overall data integrity. To address these areas and strengthen program performance statewide, the following recommendations focus on improving foundational processes, enhancing staff capacity, and leveraging collaborative opportunities.

Offer Regular Refresher Training

- Regions are encouraged to integrate brief refresher trainings throughout the year to reinforce expectations related to documentation standards, timely ICC data entry, and high-quality assessments. Incorporating short case review discussions into team meetings can help staff consistently evaluate that participant files are complete and accurate. A structured onboarding checklist that outlines essential case management responsibilities can further support new staff in developing skills and meeting program requirements.

Use Case Note Templates and Institute Quality Checks

- Recurring documentation issues may be reduced by using standardized templates for assessments, barrier reviews, and ISS/IEP entries. Establishing regular file cleanup periods gives staff dedicated time to resolve discrepancies, update participant records, and ensure alignment between case notes and services. ICC reporting tools should be used proactively to flag missing documents, untimely entries, and other indicators of data inconsistency before monitoring occurs.

Practice Assessment Conversations

- Thorough assessments remain a critical component of effective case management. Regions may benefit from having case managers practice using structured prompts to guide assessment conversations and implement barrier alignment checks to ensure service plans accurately reflect participant needs. Mock assessment interviews and role playing with staff, followed by practice writing and feedback sessions allow case managers to strengthen interviewing techniques and improve the quality of their documentation.

Expand Peer Review and Mentoring Opportunities

- Peerbased learning can play an essential role in improving consistency and documentation quality. Quarterly peer review groups, documentation sharing, and structured mentoring between new and experienced staff can support skill development and enhance service delivery practices. Observational learning opportunities, such as shadowing assessments, counseling sessions, and followup interactions, can further reinforce effective techniques.

Increase CrossRegional Collaboration

- Partner with other Regions for monitoring and sharing best practices can yield more objective feedback and help identify solutions to persistent challenges. Collaborative working groups can also support joint development of checklists, templates, and training materials.

Use ICC More Strategically

- Regular use of ICC reporting functions allows Regions to review targeted participant groups, verify documentation quality, and identify issues prior to key milestones such as training enrollment or exit. Ongoing ICC refresher training tailored to commonly identified monitoring issues can strengthen staff proficiency and promote consistent use of system tools.

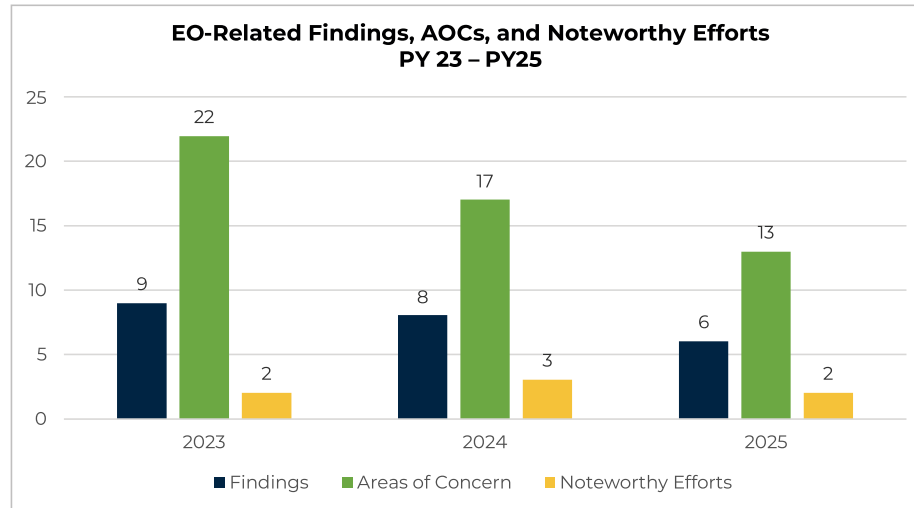
Elevate Priority of Service Awareness and Tracking

- To improve engagement with Priority of Service populations, Regions may consider developing dashboards or periodic progress snapshots showing numbers of people from priority populations served. Brief updates during team meetings and targeted informational sessions can reinforce requirements and highlight successful practices.

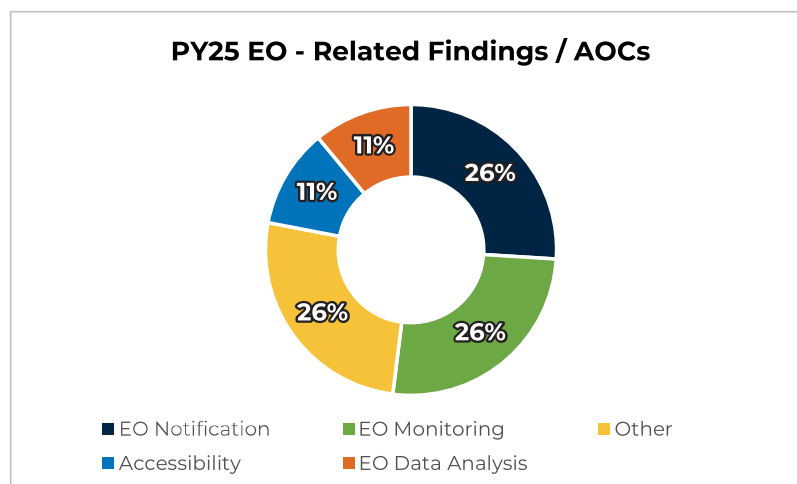
Improve Alignment Between Case Notes, Services Delivered, and Performance Reporting

- Ensuring that case notes accurately support services, MSGs, credentials, and followup plans is essential to maintaining data integrity. Preexit documentation reviews and usage of alignment guides can help staff verify that all components of the participant record are complete, consistent, and reflective of actual service delivery.

WIOA Title I – Equal Opportunity (EO) Outcomes



- PY25 compliance reviews identified a decrease in EO-related Findings and AOCs from PY23 and PY24. This decrease can be attributed to Regions improving their investigation of EO data analysis results and including EO notifications as required.
- The number of repeat EO related Findings/AOCs decreased as well, which indicates that Regions are taking actions when EO issues are identified in compliance review reports.
- However, even with the overall decrease, there was an increase in several Regions' lack of monitoring its One-Stop Operator (OSO) for EO requirements.
- The number of accessibility, staff training, and client documentation issues remained the same from PY24 to PY25.
- Similar to the Program-related Findings/AOCs discussed above, while the total number of EO-related Findings/AOCs decreased from PY24 to PY25 the percentages of types of issues identified – EO notification, EO monitoring, other, and accessibility – remained relatively the same.
- Multiple regions, more than in any other year, had no Findings/AOCs. One region accounted for over a third of all EO related Findings and AOCs.



EO Notification

- 26% of EO-related Findings/AOCs in PY25 were related to Regions not publishing EO is the Law notices or posters as required.
- WIOA recipients have an obligation to publish EO notices that they do not discriminate on any prohibited basis and ensure that required EO assurance language is in applicable agreements, etc ([29 CFR 38](#), [DWD Policy 2016-09, Change 2](#)).

EO Assurance Language

- Regions must include required EO Assurance Language in contracts, Memorandums of Understanding (MOUs), On-the-Job Training (OJT) contracts, work-experience (WEX), and other agreements ([29 CFR 38](#), [DWD Policy 2016-09, Change 2](#)).
- Three Regions were cited for their sampled documents, mostly WEX and OJT agreements, not including required EO Assurance Language. In PY24 four Regions were identified with this issue. DWD recommends that Regions adopt a process that includes the Local EO Officer reviewing all draft contracts and agreements prior to being finalized. This should include any service providers' boilerplate language for their WEX and OJT agreements.

EO is the Law Notifications Not Posted Appropriately

- In PY25 reviews, monitors saw more WorkOne offices with EO is the Law posters posted compared to in PY24; however, one region was missing the notice in its personnel files.
- Regions must communicate to registrants, applicants for employment, and employees that they do not discriminate in how services are delivered ([29 CFR 38.35-38.36](#)). EO is the Law notices must be posted in prominent places within WorkOne offices, disseminated to participants and employees, and included in group presentations.
- Please note that if a Region changes its Local EO Officer, all [EO is the Law posters](#) should be updated with the new EO Officer's name and contact information.

EO Tagline

- Prior to PY25 monitoring, DWD updated the EO Tagline in [DWD Policy 2016-09, Change 2](#). Overall, Regions did a thorough job updating the tagline on social media pages and where needed but there were some instances identified where updates were needed.
- The EO tagline indicates that the WIOA program or activity is an equal opportunity employer/program, and that free auxiliary aids and translation services are available upon request to individuals with disabilities. It must be included in all marketing material, including written materials, social media, websites and broadcasts.

Regions' EO Monitoring

- 26% of EO related Findings/AOCs were related to issues with Regions' subrecipient monitoring. The number of regions identified with EO subrecipient monitoring issues increased significantly from PY24 to PY25, with One-Stop Operators not being monitored for EO issues being cited most frequently. OSOs are subrecipients under WIOA and are therefore subject to monitoring; see also [DWD Policy 2024-07, Change 1](#).
- Local EO Officers are required to monitor their subrecipient service provider(s) and OSO to ensure their practices align with nondiscrimination and EO obligations ([20 CFR 38.31](#)). Having a monitoring procedure/policy, tool, and report that is provided to each subrecipient with outcomes and a resolution process helps to fulfill this requirement.

Other

- 26% of EO-related Findings/AOCs were related to the following issues:

Improper Management of Medical or Disability-Related Information

- The number of Findings/AOCs based on participant ICC records containing individuals' medical diagnosis or disability-related information was consistent from PY24 to PY25 reviews.
- Per [29 CFR 38.41](#) and [DWD Policy 2023-05](#), any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected and reported on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in separate files, apart from any other information about the individual, and must be locked or otherwise secured.
- It should be noted that while DWD only included Findings/AOCs based on improper management of medical or disability information in three regions' compliance review reports, more instances were identified in the Program section of reports as File Management issues. To determine whether to issue a separate EO-related Finding/AOC, DWD considered the number of files identified with medical or disability information, the severity of the disclosure(s), and how quickly or thoroughly the Region responded to correcting these errors.

Staff EO Training

- In both PY24 and PY25, compliance reviews identified two regions with Findings/AOCs related to staff EO training.
- Per [DWD Policy 2016-09, Change 2](#), the Local EO Officer is required to provide training to LWDA staff and service providers. Training all WorkOne staff consistently across all offices on accessibility tools for people who are deaf, have difficulty hearing, and/or have limited English proficiency is paramount to providing equal access. The Local EO Officer should be able to provide training dates and topics.

Accessibility

- 11% of EO-related Findings/AOCs were related to accessibility. Two regions' compliance review reports cited accessibility issues in PY25 compared to just one region in PY24. Regions must ensure all of their WorkOne offices are physically and programmatically accessible, ensuring that individuals with disabilities can take full advantage of all resources. Regulations require that all comprehensive and affiliate offices meet applicable accessibility obligations under [Section 504 of the Rehabilitation Act](#) and the implementing regulations at [29 CFR Part 32](#) and the [Americans with Disability Act](#) (ADA).
- The majority of WorkOne offices that DWD visited in PY25 met accessibility requirements, however, when offices needed to move to temporary locations procedures to assure continued accessibility were not consistently followed.
- Local EO Officers must demonstrate that they are checking office accessibility per [DWD Policy 2016-09, Change 2](#). A tool known as the "[ADA Checklist](#)" is available on the [DWD Equal Opportunity webpage](#) for this purpose.
- In addition, Regions must ensure programmatic accessibility to facilities, programs and activities for individuals with disabilities. According to [29 CFR Part 38.15\(a\)1](#), Regions must ensure that their communication with participants with disabilities is as effective as their communications with other participants.

EO Data Analysis

- 11% of EO-related Findings/AOCs were related to Regions' EO data analysis. While all Regions had completed an EO data analysis, two Regions were cited for not investigating the analysis results as described in [29 CFR 38.51](#) to determine if these appeared to be caused by discrimination.

Changes to DWD EO Monitoring

Due to the rescission of [29 CFR 38.40](#) and update to [DWD Policy 2016-09, Change 2](#), DWD will no longer be monitoring Regions' efforts of affirmative outreach. Affirmative outreach included targeted advertising and reaching out and consulting with community service groups for those protected groups under [29 CFR 38](#).

The requirements for Regional EO Data Analysis have been updated due to these changes ([DWD Policy 2016-09, Change 2](#)). DWD will no longer be requiring Regions to submit an EO data analysis. The State EO Officer or EO Compliance Specialist will be providing a data analysis run by DWD and the Regions will be required to investigate the significant differences noted in the data analysis. Instructions were sent to Local EO Officers in August 2026.

State of Indiana EO Data Analysis

- WIOA grant recipients are required to conduct an EO data analysis and subsequent investigation into significant differences identified in populations receiving services ([29 CFR 38.51\(b\)](#)).
- DWD's State EO Officer conducts an EO data analysis utilizing a standard deviation (SD) formula developed by the National Association of State Workforce Agencies' (NASWA) EO Subcommittee which compares program WIOA recipient demographics with US Census data on gender, race, ethnicity, age, and disability status.
- For PY25 monitoring, DWD's analysis was done comparing PY24 ICC data for WIOA enrollments to both population labor force and unemployment data from the U.S. Census. The goal of the analysis is 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 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 factors and should be investigated for possible discrimination and/or possible reasons for the outlier.
- If a category's SD is greater than +2.0, it suggests services may have been provided significantly less to people in that protected group and therefore indicates a higher probability of possible discrimination.
- The table below shows Indiana's data analysis results as an entire state.

Indiana PY 24 WIOA Participation (Labor Force Data)

Category	Deviation	Need to Investigate
Black/African American	-48.28	No
Asian	3.84	Yes
Ethnicity	-4.96	No
Age	22.44	Yes
Disability	-30.84	No
Sex	-5.93	No
LEP	-0.01	No

Indiana PY 24 WIOA Participation (Unemployment Data)

Category	Deviation	Need to Investigate
Black/African American	-17.98	No
Asian	1.95	No
Ethnicity	0.96	No
Age	23.69	Yes
Disability	-6.29	No
Sex	-4.81	No
LEP	-0.01	No

Statewide we can see that protected groups with higher SDs include individuals 55+ years old and people of Asian race. These were the same protected groups with high SDs for PY2023, PY2022 and PY2021 data. The Compliance Team's analysis of each Region was included in each Region's WIOA monitoring reports.

Suggestions for Improvement

Combined Monitoring

- Consider combining subrecipient EO monitoring with WIOA Program subrecipient monitoring, EO components with OSO monitoring, and including an EO monitoring results section in the monitoring reports provided to the recipients. This will ensure that all recipients are monitored, and results are communicated to them. Any feedback provided can be used to plan additional training. Monitoring should also include checking files for improper documentation of medical or disability related information.

Checking WorkOne Offices

- Local EO Officers could conduct spot checks to check that all public areas of offices are accessible, EO is the Law posters are still up in the offices and reflect your name and contact info, and that staff can know who you are. Visiting the WorkOne offices also gives a good opportunity to informally address any staff questions, concerns, or issues.

Participate in Quarterly DWD EO Meetings

- These meetings provide an opportunity for sharing ideas and perspectives and give Regions a chance for brainstorming together.

Document All EO-Related Training

- Be sure to document all training for Local EO Officers as well as staff. If you thought a particular training had especially great information or was particularly interesting, share it with other EO Officers.

Incorporate Case Scenarios into Training

- Consider incorporating case scenarios in staff training on what to do or not to do in different situations. Examples could include how to assist a customer with a specific disability or someone with limited English proficiency.

Review EO Assurance Language

- Consider having a process to ensure that EO assurance language is reviewed in all new contracts and agreements. Any changes to boilerplate language should also be included in this process.

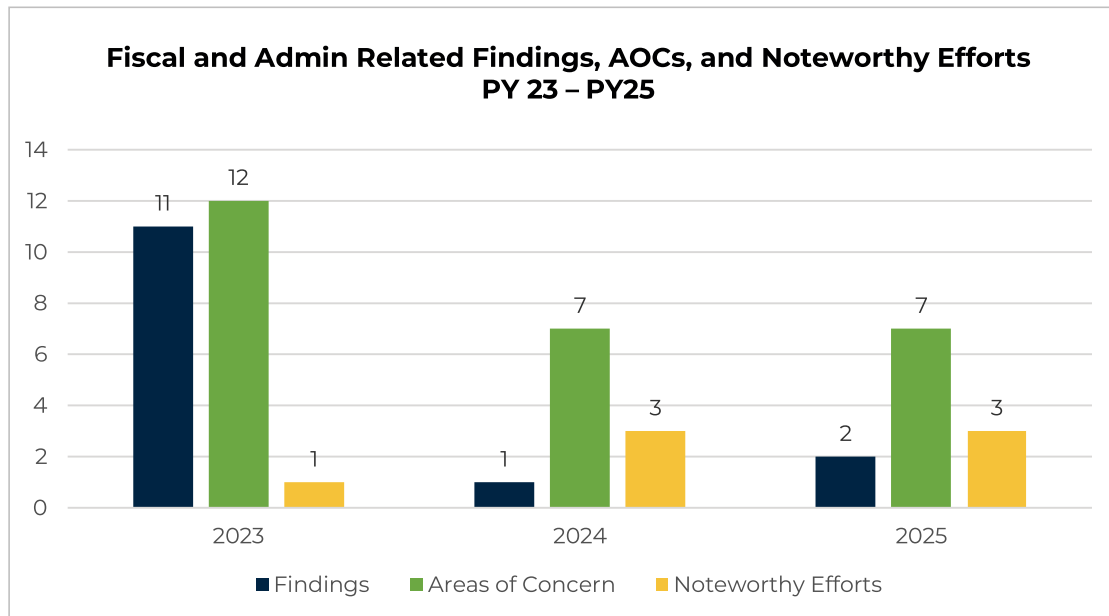
Address DWD Monitoring AOCs

- Work on addressing issues identified in DWD's compliance Reports as AOCs. When DWD issues AOCs it provides recommendations to support the Region but these are not intended to be prescriptive. Consider if other means would be better suited for your staff and processes to obtain desired outcomes. Keep in mind that if not addressed, the basis of AOCs have the potential to be repeated as an AOC or a Finding with corrective action the following year.

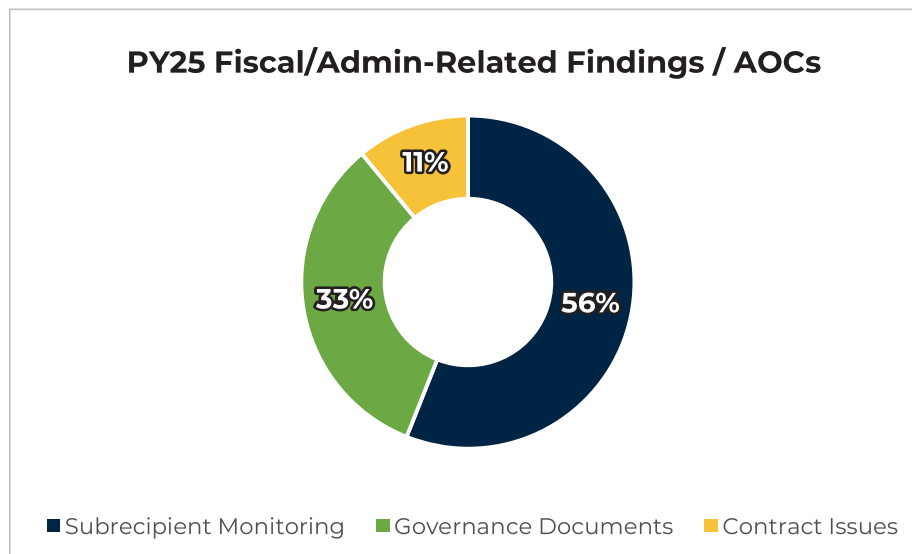
Reach Out to Your State EO Officer

- Contact EO@dwd.in.gov or Jennifer Greimann, State EO Officer for questions, concerns, resources and overall guidance.

WIOA Title I – Fiscal/Administrative Outcomes



- There has been significant improvement in the number of Fiscal/Admin-related Findings/AOCs from PY23 to PY25.
- Regions have improved aligning the contents of its governance documents with DWD Policy requirements which includes appropriately staffing its LWDB memberships, including required population information in CEO Agreements and gaining the commitment of its local elected officials as evidenced by CEOs signatures on CEO Agreements.
- Regions have also improved their use of WIOA funds.
- While the number of Fiscal/Admin related AOCs has stayed the same from PY24 to PY25, compliance reviews cited subrecipient monitoring issues in five regions.



Subrecipient Monitoring

- In PY25 Subrecipient Monitoring accounted for 56% of all Findings/AOCs which included regions lacking subrecipient monitoring policy, OSO monitoring not included in regions' monitoring policies, no documentation of OSO monitoring being conducted.
- [DWD Policy 2024-07, Change 1](#), states "Each WDB must develop and implement a Local Monitoring Policy that addresses oversight and monitoring of their subrecipients and contractors. Copies of the policy as well as monitoring results and resolutions shall be submitted to the Compliance Team upon request."

Governance Documents

- Overall, there has been significant improvement in the quality of Regions' governance documents which were cited as Findings/AOCs in 70% of PY23 compliance reviews, 75% in PY24, and 33% in PY25.
- PY25 showed an approximately 50% reduction in CEO Agreement issues compared to PY24.

Contract Issues

- One Region was identified in DWD's PY25 monitoring for needing to strengthen its One-Stop Operator (OSO) Coordination and Oversight contract.

Suggestions for Improvement

The PY25 monitoring review identified ongoing challenges with subrecipient monitoring policies not kept current in reflecting the need for OSO oversight ([DWD Policy 2024-07, Change 1](#)), CEO Agreements missing required signatures ([DWD Policy 2019-02, Change 4](#)), and contract implementation issues. The following recommendations focus on standardizing policy review timelines and creating a master spreadsheet to track contract expirations, which will help establish clearer administrative controls and better leverage staff capacity.

Fiscal/Admin

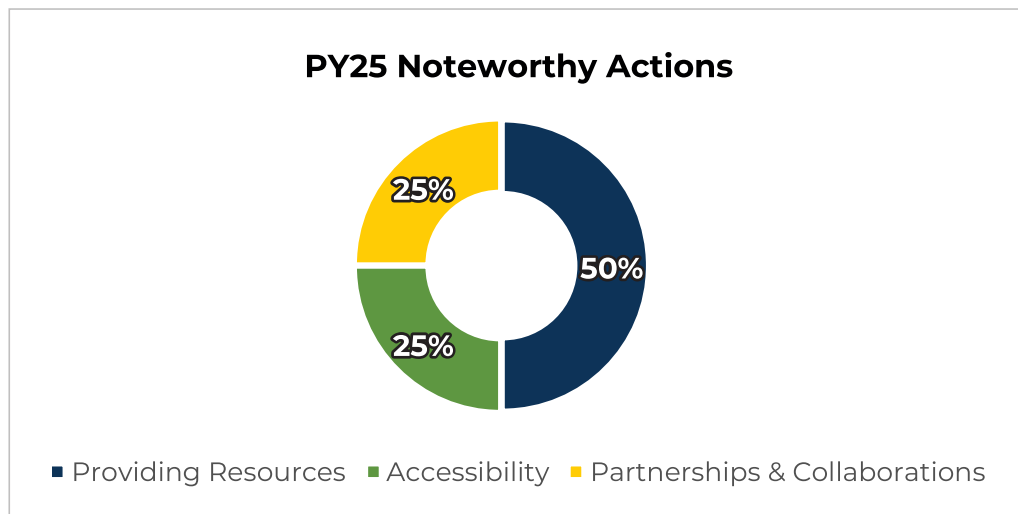
- Create a master spreadsheet of all LWDA policies and review it annually. Although these policies may not have set deadlines, this process ensures each policy stays up to date with current compliance guidance and promotes consistency across service providers.
- Provide monitoring staff with annual refresher training focused on documentation quality, compliance requirements, and risk assessment.
- Develop a standardized internal controls framework that includes fiscal documentation requirements, cost allocation procedures, and expenditure justification protocols. Implementing this operational step will strengthen the use of standardized templates before monitoring and contract reviews and will help establish clearer administrative controls.

Governance Documents and Agreements

- Collaborate with DWD Compliance team at oversight@dwd.IN.gov to review the board membership templates. [DWD Policy 2019-02, Change 4](#) (Attachment D) directs regions to submit changes to the board membership within 90 days. Adding this review step positions regions to proactively partner with DWD to identify and mitigate potential membership issues that could impact WDB certification ahead of the next annually scheduled WIOA compliance review.

WIOA Title I – Noteworthy Efforts

Noteworthy Efforts are DWD's way of recognizing regions for implementing innovative and impactful practices. These efforts reflect strategies developed by the regions that go beyond regulatory, statutory, and policy requirements to support their staff and improve outcomes for participants and other stakeholders. They highlight regions' spirit of service and dedication. 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.



Providing Resources

Workforce Development Board Introduction Document

One region developed a one-page Introduction to its Workforce Development Board document to inform individuals considering service as a member. This comprehensive resource provides a clear overview of board member roles and responsibilities, identifies the counties within the board's jurisdiction, and includes relevant regional and contextual information to support informed decision making. The document also offers prospective board members valuable insight into the level of commitment required, the partners and stakeholders with which they will collaborate, and the impact of their service on the communities within the Region. Additionally, it serves as an effective marketing and recruitment tool for the current board seeking to engage and attract new members.

WIOA Subrecipient Monitoring

One region's One-Stop Operator and service provider monitoring reports demonstrated a strong commitment to high-quality services and exceeded standard requirements, showing active board engagement through the involvement of both Board staff and the Board Chair. The OSO monitoring offered a thorough review of responsibilities such as partner coordination, service integration, customer satisfaction, staff development, continuous improvement, and EO compliance. The service provider's subrecipient monitoring report further strengthened this effort by including detailed case-note quotes, income and expense calculations, and policy citations to clearly explain identified issues and guide corrective actions. This level of detail supports staff learning and ensures corrections are grounded in policy. All issues were promptly resolved, reflecting the Region's dedication to compliance, transparency,

and continuous improvement, which was confirmed through the Compliance Team's PY25 record review showing accurate documentation, timely corrections, and adherence to federal, state, and local requirements.

Use of Digital Platforms to Enhance Services to Customers

One region has demonstrated a strong commitment to supporting participant success by providing case managers with access to three digital platforms: Hardly, SlateUp, and BuildEd. These tools enhance case managers' abilities to deliver individualized employment services by assisting participants with resume development, connecting with employers, exploring career pathways, and strengthening soft skills needed for long-term employment success. By equipping staff with a variety of technology-based resources, the Region has expanded the level of support available to participants and improved access to comprehensive job search and career readiness services. Together, these digital services improve the efficiency of case managers while empowering clients with the tools and skills needed to find and maintain meaningful employment.

Talent Bound Work-based Learning Toolkit

One region's Talent Bound work-based learning toolkit gives employers a clear, accessible overview of how to engage with schools and community organizations by offering a visually appealing continuum of activities—from career exploration and workplace tours to job shadowing, internships, and apprenticeships—supported by the “Bridging the Gap” guide explaining the Region's intermediary role, the benefits of work-based learning, levels of employer involvement, cultural considerations, best practices, and success stories. Designed to simplify employer engagement, the toolkit helps Business Services staff quickly identify employer needs and offer tailored options, enabling employers to select from a menu of involvement levels without requiring extensive explanation. By streamlining conversations and clarifying opportunities, the Talent Bound toolkit strengthens employer relationships and supports the Region's mission to guide and grow the local workforce ecosystem.

Partnerships

Partnerships and Collaborations

One region, in concert with local service provider organizations, the local Ivy Tech community college and several employers collaborated to win a grant with the goal of creating a program that delivers both training and employment opportunities for individuals. The result is the development of an eight-week earn-and-learn program that combines hard skills training (HAZMAT and OSHA certifications) and soft skills development in areas such as workplace readiness and work ethics. Beyond immediate training and employment, the grant also opens doors to potential additional opportunities through WorkOne, including pre-apprenticeships, apprenticeships, and long-term employment opportunities in city government. This collaboration holds transformative potential for the area's workforce and the broader community.

Workforce Partnerships

One region strengthened its commitment to innovative workforce development by forming a strategic partnership that expanded employment opportunities for justice-involved individuals and deepened community connections. Building on an existing relationship with a former WIOA Adult participant who advanced into a leadership role within the local justice system, the Region collaborated to integrate workforce services into a new reentry initiative focused on addiction recovery, personal development, and workforce readiness. Through WorkOne leadership and coordination with community partners, career readiness and employment preparation were embedded directly into the program, creating

a seamless pathway to employment for individuals reentering the community. This partnership illustrates the Region's ability to cultivate long-term relationships, respond to emerging needs, and align workforce services with local initiatives, ultimately expanding access to employment resources for a population facing significant barriers and demonstrating a proactive approach to developing sustainable, high-impact collaborations.

Accessibility

Cameras on Resource Area Computers

To enhance accessibility and service delivery, one region has procured and installed web cameras on computers located in the WorkOne offices' resource areas. This upgrade enables customers to access video remote interpreting (VRI) services, which are available through the state's contracted interpretation providers. In accordance with 29 CFR 38.15, recipients are required to provide appropriate auxiliary aids and services to ensure individuals with disabilities have equal access to WIOA Title I services. VRI serves as a critical auxiliary aid for individuals who are deaf or hard of hearing and communicate using American Sign Language (ASL). Additionally, the integration of web cameras supports broader access to interpretation services by allowing all customers to utilize the video functionality of both web-based and mobile application versions of Propio ONE, which is a user-friendly platform that connects individuals to professional interpreters in more than 300 languages including American Sign Language within seconds.

Accessibility Reviews of Potential Office Spaces

One responsibility of the Local EO Officer is to assess WorkOne offices for compliance with applicable accessibility requirements. During the Compliance Team's monitoring, one region disclosed that several of its offices are expected to be relocated in the near future. The Local EO Officer explained that prior to selecting new spaces for WorkOne offices she participates in the site review process and evaluates prospective locations for compliance with ADA requirements. By identifying potential accessibility concerns before occupying a new location, the Region can address deficiencies during lease negotiations or consider alternative sites that better meet ADA requirements. This proactive approach demonstrates the Region's commitment to ensuring accessible facilities for all customers.

Employer Training Grant (ETG)

In PY25 DWD monitored the ETG Rounds 7.0 and 8.0 of funding. Review activities consisted of an interview with the Region's Business Services Representatives to discuss how grant funds were being used and analysis of five sample employers' required documentation. Monitoring results included the following:

- No issues were identified with sampled employers' training plan documentation
- Eleven regions needed to be reminded of the requirement to upload a copy of the electronic transfer of funds to employers to validate that payments were received; however, all regions were able to quickly upload copies of the transfers when brought to their attention.
- All regions improved their ability to handle supporting documentation appropriately which had been an issue identified in PY24 reviews.
- Regions continued to struggle having staff dedicated to administering the ETG.

The charts below show some of the key performance metrics for Rounds 7.0 and 8.0 of ETG funding.

ETG, Round 7.0

Grant Term: 7/1/2023 – 12/31/2024
As of 2/28/2025

Metric	Measure
Total Amount Awarded	\$12,053,500.00
Total Amount Paid	\$10,045,272.69
Employers Supported	392
Trainees	4,491
Average Wage	\$23.26

ETG, Round 8.0

Grant Term: 7/1/2024 – 6/30/2025
As of 9/30/2025

Metric	Measure
Total Amount Awarded	\$10,708,000.00
Total Amount Paid	\$9,545,612.97
Employers Supported	647
Trainees	4,331
Average Wage	\$24.36

Changes to DWD Monitoring for Business Services Grants

For PY26, depending on each Region's review date and which grant(s) were utilized, DWD will be monitoring the following Business Services Grants:

- ETG 9.0 (7/1/25-12/31/26)
- Power Up Indiana (10/1/25-6/30/27)
- Power Up Employer Training Grant (PUETG) (7/1/26-6/30/27)

This monitoring will include an interview with each Region's Business Services Representatives to discuss how grant funds are being used and a review of sample employers' required documentation.

\$5 million in PUETG funds have been awarded for regions to work with eligible employers on a reimbursement basis to provide approved training programs to upskill their staff.

Business Services Grants ETG, Round 9.0

Grant Term: 7/1/2025 – 12/31/2026
as of 9/11/2025

Metric	Measure
Total Amount Awarded	\$2,800,000.00
Total Amount Paid	\$2,333,704.66
Employers Supported	234
Trainees	1,192
Average Wage	\$24.12

Business Services Grants Power Up Indiana

Grant Term: 10/1/2025 – 6/30/2027
as of 9/11/2025

Metric	Measure
Total Amount Awarded	\$4,300,000.00
Total Amount Paid	\$721,924.46
Employers Supported	43
Trainees	221
Average Wage	\$26.16

Suggestions For Improvement

- Familiarize yourself with the Compliance Manual for the funding sources utilized:
 - [ETG Manual](#)
 - [Power Up Indiana Manual](#)
 - Watch the DWD website for the Power Up Employer Training Grant compliance manual.

- Outreach to the DWD Employer Engagement Team for support as needed.
- Utilize the Business Services Regional Teams channel to access updates and communication from the Employer Engagement Team.

Jobs for Veterans State Grant (JVSG) program

During PY2025, the Compliance Team conducted an internal review of the Jobs for Veterans State Grant (JVSG) program, which consisted of JVSG file reviews, interviews with JVSG program staff, and interviews with WorkOne staff. The following results are being shared here as they relate to responsibilities of WorkOne staff.

- Deficiencies were identified that reflect gaps in both initial customer intake and the subsequent referral procedures required to ensure veterans receive appropriate and timely services ([DWD Policy 2024-06](#)).
- WorkOne staff are not always conducting appropriate veteran screening during the first point of contact. Required veteran questions were not consistently asked and/or the required veteran screening form was not always completed. As a result, veteran customers may have been overlooked or inaccurately classified, preventing them from being connected with Disabled Veterans Outreach Program (DVOP) Specialists and services intended to support their unique needs.
- Cases were identified in which WorkOne staff made incorrect JVSG eligibility determinations. This led to missed or delayed opportunities for the veterans to access the individualized services and supports afforded under JVSG. Final JVSG eligibility determinations are the responsibility of DVOP Specialists, as they are specifically trained and fully knowledgeable about the program's statutory and regulatory requirements.
- Referral procedures for eligible veterans were inconsistent. Referral pathways were sometimes unclear and processes varied among staff. When DVOP Specialists are not immediately available, WorkOne staff must ensure that veterans are still offered timely, appropriate assistance. Veterans should be asked whether they would like immediate support and, if so, routed to available WIOA or other designated staff who can provide general workforce services until a DVOP Specialist becomes available. This step is essential to maintaining service continuity and ensuring veterans do not experience unnecessary delays in receiving assistance.

These issues identified during the JVSG internal review highlight the importance of accurate and standardized veteran screening. Proper identification ensures compliance with program requirements and promotes high-quality customer service for veteran customers. Effective screening and referral practices also enhance equity by ensuring all eligible veterans receive timely access to both WorkOne and JVSG-specific services.

Suggestions for Improvement

Reinforce standardized screening and referral protocols

- WorkOne staff should receive clear direction on the required screening process, specifically the requirement of asking every WorkOne customer if they've had military service as well as the completion of the veteran screening form. Also, referral procedures should be clearly documented. WorkOne staff should understand when and how to make a referral and what to do if a DVOP Specialist is unavailable.

Strengthen oversight

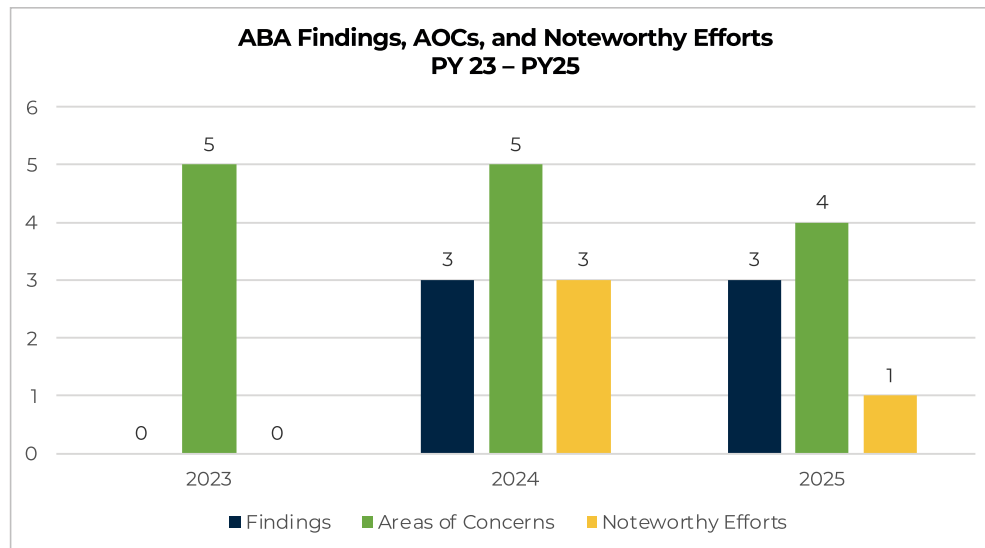
- Regions should conduct periodic reviews of intake procedures to ensure proper screening and referrals are taking place.

Utilize JVSG resources

- WorkOne staff should utilize the required veteran screening form, DVOP eligibility flowchart, and JVSG screening script provided by the JVSG program.

Through these actions, WorkOne staff will be better equipped to identify veteran customers, provide accurate and timely referrals, and uphold the program's commitment to delivering highquality services to those who have served.

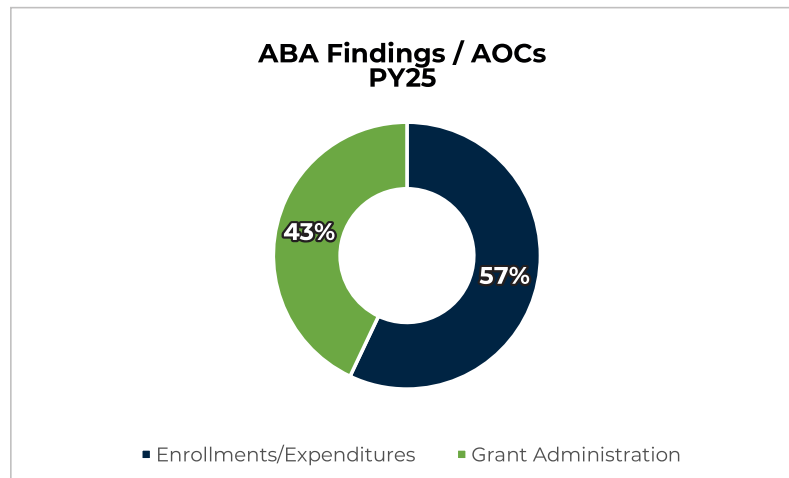
Apprenticeship Building America (ABA) Grant



As part of the PY25 ABA Grant monitoring process, the Compliance Team conducted interviews with each region's apprenticeship leadership and reviewed sample participant records to assess case file management practices and compliance with program requirements. A total of 59⁽¹⁾ participant records were reviewed.

- The number of ABA Grant related Findings/AOCs remained relatively consistent from PY24 to PY25.

¹ Includes only those participant records from the Compliance Team's randomly selected samples. It does not include other files reviewed as part of the DWD Work-Based Learning and Apprenticeship team's ABA oversight activities/efforts. No files were reviewed from one region due to ABA monitoring responsibilities beginning after the PY25 monitoring cycle was already underway.



- Five regions received Findings/AOCs related to grant management practices, low expenditure and/or participant levels, and participant eligibility. Two regions had Findings due to questioned costs.
- Grant administration issues included file management practices, missing participant signatures on required documentation, incomplete supporting documentation (such as paystubs, drivers licenses, and I-9 forms), untimely data entry, participant records containing other participants' information, and case notes that were unclear, incomplete, or did not support services documented.
- On the positive side, one region received recognition for its efforts to expand access to pre-apprenticeship opportunities for high-need populations, demonstrating effective collaboration and innovative approaches to serving targeted communities.

DWD PY26 Apprenticeship Monitoring

For DWD PY26 compliance reviews, recipients of State Apprenticeship Expansion Formula (SAEF) 3 funds will undergo monitoring that includes a comprehensive review of grant performance to ensure the program is implemented responsibly, supports apprenticeship expansion effectively, and aligns with federal and state workforce requirements. Monitoring activities will include an interview during WIOA monitoring and a participant record review.

Suggestions for Improvement

- SAEF3 grant recipients should familiarize themselves with the content provided in the [DWD Technical Assistance 2026-01 State Apprenticeship Expansion Formula, Round 3 \(SAEF3\)-Competitive Grant Subaward Guidance](#) and the [DWD Policy 2022-09, Change 2 United States Department of Labor \(DOL\) Apprenticeship Grants](#)
- Contact your DWD Work-Based Learning and Apprenticeship team with any questions at WBL@dwd.in.gov

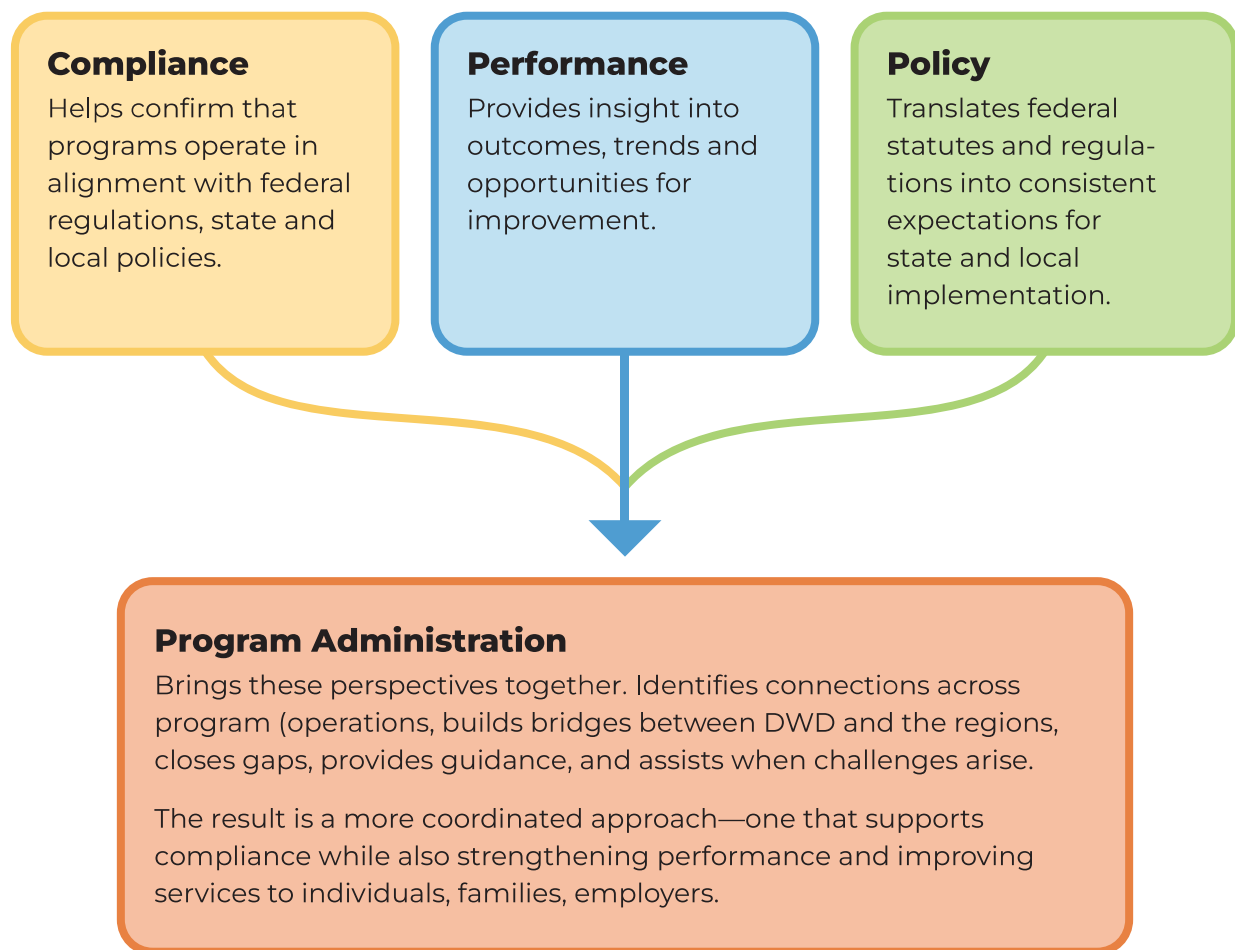
Program Administration – Technical Assistance

Connecting Compliance, Performance, and Policy - *Building bridges, closing gaps, and strengthening service delivery*

Program Administration sits at the intersection of Compliance, Performance, and Policy, providing a unique statewide perspective view of how these areas work independently—and how their combined efforts affect implementation, accountability, and outcomes in the communities we serve.

Where the Work Connects

- Compliance, Performance, and Policy each have clearly defined roles and responsibilities.



Technical Assistance as a Resource

- As part of corrective actions, the DWD Compliance Team now requires regions to schedule technical assistance when annual monitoring reports identify repeated concerns or findings. This approach reinforces technical assistance as a practical resource for addressing reoccurring challenges, clarifying expectations, and supporting sustainable solutions.

- The broader goal is to shift the way technical assistance is viewed—transforming it from a reactive measure into a preventative strategy that regions can initiate independently. Earlier collaboration can help regions identify root causes, strengthen internal processes, and reduce the likelihood that the same issue will continue to reappear.

Turning Insight into Opportunity

- The Program Administration Team will also use the information from compliance reports. Data validation reviews, policy updates, performance trends, and direct regional feedback to identify opportunities for collaboration and targeted support. Together, these sources provide a more complete picture of what is working, where additional clarity may be needed, and how DWD can better respond to regional needs. Through shared learning, timely guidance, and proactive technical assistance, DWD and the regions can continue moving forward as one state—aligned in purpose, responsive to challenges, and focused on improving outcomes for the communities we serve.

Closing

As we close the PY25 YIR, we want to recognize the dedication and collaboration demonstrated across Indiana's workforce system. The progress reflected in this year's monitoring results shows that Regions are committed to strengthening compliance, enhancing performance, and delivering high-quality services to Hoosiers. We appreciate your continued partnership and look forward to working alongside you in PY26 as we build on lessons learned, celebrate successes, and advance a workforce system grounded in quality and continuous improvement.

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